



NATIONAL ASSOCIATION OF STUDENT FINANCIAL AID ADMINISTRATORS



# CERTIFIED FINANCIAL AID ADMINISTRATOR™ (CFAA) COMMISSION STANDING RULES AND POLICIES

JUNE 2019

# Certified Financial Aid Administrator™ (CFAA) Commission Standing Rules and Policies

as of June 19, 2019

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## **Purpose of the Certified Financial Aid Administrator™ (CFAA) Program:**

The purpose of the CFAA Program is to enhance the future of the financial aid community by inspiring quality job performance, encouraging continuous learning, and promoting professional development among financial aid administrators at colleges and universities across the country. The CFAA Program helps the higher education community and its stakeholders recognize financial aid administrators for their knowledge and experience, their role as stewards of taxpayer dollars and institutional funds, their contributions to the success of their institutions and their students, and their commitment to the highest standards of ethical behavior.

## **Certification Mission:**

The CFAA Commission establishes competencies for excellence in financial aid administration and certifies individuals who have proficiency with the body of knowledge pertaining to administering federal (Title IV) financial aid and its interaction with state and private financial aid.

## **Certification Diversity Statement:**

The CFAA Commission is committed to diversity and equality in all activities. The CFAA Commission, in both its principles and practices, is committed to providing the financial aid community with credentialing practices that are based on inclusion and diversity.

This means that there shall be no barriers to participation in any activity of the Commission on the basis of race, ethnicity, gender identity or expression, religion, age, sexual orientation, nationality, disability, appearance, geographic location, professional level or institution type.

The Commission will seek diversity and inclusiveness in its business practices, and it will not condone any form of unlawful discrimination.

The CFAA Commission recognizes and values the diverse skills, perspectives and experiences of the financial aid community and believes inclusiveness enhances the Commission's ability to serve this community.

## **STANDING RULE 1 – COMMISSION NAME AND PURPOSE**

The CFAA Commission is an independent certifying body of the National Association of Student Financial Aid Administrators (NASFAA). The CFAA Commission awards the Certified Financial Aid Administrator™ (CFAA) credential and is responsible for setting policy and standards related to the CFAA Program.

## **STANDING RULE 2 – CFAA PRINCIPAL OFFICE**

Section 1. The principal office of the CFAA Program is the office of NASFAA, which is a nonprofit corporation incorporated under the law of the District of Columbia.

Section 2. The CFAA Program may have such other office or offices at such suitable place or places within or without the District of Columbia as may be designated by the CFAA Commission.

## **STANDING RULE 3 – CFAA COMMISSION COMPOSITION**

Section 1. The CFAA Commission shall consist of the following:

- (a) The Officers:
  - a. Elected: Commission Chair, Commission Chair-Elect, Immediate Past Commission Chair;
  - b. Appointed: CFAA Fiscal Officer, CFAA Program Manager, Secretary.
  
- (b) Six (6) regional representatives: One NASFAA member from each of the six regional professional associations, each of whom:
  - a. Has earned the CFAA designation and remains in good standing;
  - b. Is currently employed as a practicing aid administrator by a Title IV Eligible Institution; and
  - c. Helps represent the diversity of the financial aid profession.

These members will serve for a two-year term, renewable at the discretion of the CFAA Commission Officers.

- (c) One (1) Public Representative: One member shall be a non-CFAA consumer/public member selected according to criteria outlined in the standards of the National Commission for Certifying Agencies (NCCA). This individual will serve for a three-year term, renewable at the discretion of the CFAA Commission Officers. The public member shall be an individual who represents the interests of direct and indirect users of CFAA skills and services; who is serving in a volunteer capacity; and who is interested in ethical, professional behavior on the part of financial aid administrators. The public member shall not be/have:
  - a. A current or previous financial aid administrator;
  - b. A supervisor, manager, direct co-worker, or an employee or subordinate of financial aid administrators;
  - c. An employee of an individual certified by the certification program or of an employer of individuals in financial aid administration;
  - d. A person who currently receives or within the last five years has received income from financial aid administration; or
  - e. Worked for or provided contract services to the CFAA Commission or NASFAA at any time during the five years preceding his or her appointment as a public member.

- (d) Up to Two (2) Commissioners-At-Large: The number of Commissioners-At-Large will be at the discretion of the Commission Chair, and generally vary between one and two. These members will serve for a one-year term, renewable at the discretion of the CFAA Commission Officers. Each Commissioner-At-Large:
  - a. Has earned the CFAA designation and remains in good standing;
  - b. Is currently employed as a practicing aid administrator by a Title IV Eligible Institution; and
  - c. Helps represent the diversity of the financial aid profession.
- (e) NASFAA Staff: At the discretion of the NASFAA President or the President's designee, one or more NASFAA staff members will serve as ex-officio, non-voting Officers.

Section 2. Terms of office of members of the CFAA Commission not specified elsewhere in these Standing Rules shall be as follows:

- Regional Representatives serve for a two-year term, renewable at the discretion of the Commission Officers.
- The Public Representative will serve for a three-year term, renewable at the discretion of the Commission Officers.
- Commissioners-At-Large will serve for a one-year term, renewable at the discretion of the Commission Officers.
- The terms of Commissioners elected as Chair or Chair-Elect may be extended in order to fulfill their terms as an Officer.
- Regional Representatives' terms are offset, so some of the Commission members will be eligible for renewal or replacement every year.
- All voting members of the Commission are limited to two consecutive terms.

Section 3. When the term of service ends for one or more Commissioners, nominations will be brought forth to the Commission Officers. Appointment of voting members of the Commission will be confirmed by a unanimous decision of Elected Commission Officers during the last meeting of the fiscal year. Nominees must fully comply with Commission member requirements as established by the Commission. Prior to the last meeting of the year, NASFAA Staff will provide the Commission a list of eligible CFAAs to the Commission to review and nominate. In addition, those interested in serving on the Commission may be asked to submit a completed form and questionnaire developed exclusively for service on the Commission.

Section 4. Vacancies of Regional Representatives and Commissioners-At-Large shall be filled as follows:

- (a) In the event that a current Commission member cannot complete his or her term, the Commission Chair may appoint a new Commission member to complete the remainder of the service term for that position.
- (b) In the event of a vacancy in the Chair position, the Chair-Elect shall assume the duties. In the event of a vacancy in the Chair-Elect position, an election will be held.
- (c) Regional Representatives may maintain position eligibility through the remainder of the existing term if they relocate from their original region from which they were appointed.
- (d) In the event that a current Commission member no longer meets the position eligibility requirements, the Commissioner will effectively resign from the CFAA Commission.

Section 5. Resignation or Removal:

Commission members may resign for any reason. A Commission member may be removed from office for failure to perform the duties required of Commission members by a 2/3 vote of the Commission. If a Commission

member resigns or is unable to serve, the Commission Chair shall appoint a new Commission member to complete the remainder of the service term for that position.

Section 6. Meetings of the CFAA Commission shall be held at the call of the Committee Chair or by petition of four (4) or more members of the Committee.

- (a) At least two meetings will be in person. Other meetings may be conducted virtually or in person.
- (b) At any meeting of the Commission, a majority of the voting members shall constitute a quorum.
- (c) Revisions, additions or deletions of CFAA Commission Standing Rules require a two-thirds (2/3) vote. Revisions, additions or deletions of Policies require a simple majority vote. Unless otherwise specified, approval requires a simple majority vote.

Section 7. The Chair, Chair-Elect and Immediate Past Chair shall serve as the elected Officers of the Commission. The CFAA Fiscal Officer, CFAA Program Manager, and Secretary serve as the appointed officers of the Commission. The Officers shall set meeting agendas, and between meetings of the Commission shall address matters involving interpretation of policies previously approved by the Commission. Elected Officers shall serve for a one-year term; appointed Officers do not have a term limit. The Chair and Chair-Elect will continue to serve on the Commission beyond the standard two-year term to complete their terms as Officers. The Commission Chair refrains from casting a vote, except in a case of a tie. Each Appointed Officer shall serve as an ex-officio, non-voting member of the Commission.

## **STANDING RULE 4: CFAA COMMISSION RESPONSIBILITIES**

All certifying powers of the CFAA Program shall be exercised by or under the authority of the CFAA Commission, and the activities and affairs of the CFAA Program shall be managed by or under the direction, and subject to the oversight, of the CFAA Commission.

Responsibilities of the CFAA Commission and its members include:

1. Set the strategic direction for the CFAA Program.
2. Act to assure fiduciary responsibility to the CFAA Commission.
3. Establish, monitor and revise, as needed, the standing rules and policies, and procedures related to the CFAA Program. All standing rules and policies shall be reviewed annually and published [made publicly available] on the CFAA website, except those policies the release of which could potentially jeopardize the security or integrity of the examination or the security or integrity of the program.
4. Initiate periodic job analysis studies and utilize the results to keep the CFAA examination specifications current.
5. Develop, monitor and revise, as needed, the CFAA initial and renewal application criteria and forms.
6. Approve the passing score for each exam.
7. Set examination policies within accepted psychometric practices.
8. Establish testing dates and approve fees for the CFAA examination and program.
9. Audit and monitor all CFAA testing and vendor products on an as-needed basis for the purpose of quality improvement compliance.
10. Respond to concerns and recommendations by CFAA candidates and certificants about the CFAA Program.
11. Confer CFAA designation on qualified candidates and revoke the designation as appropriate.
12. Hear appeals brought before the Commission based on established policy.
13. Investigate, deliberate, and bring to resolution, according to the Standing Rules and Policies, all professional conduct complaints against Certificants.

14. Attend CFAA Commission meetings and serve on committees and task forces or in other official functions as requested by the Commission Chair.
15. Actively promote the CFAA Program.

## **STANDING RULE 5 – CFAA COMMISSION OFFICERS**

### Section 1. Elected and Appointed Officers

- (a) The elected Officers of the Association shall consist of a Commission Chair, Commission Chair-Elect, and Immediate Past Commission Chair, who must be representatives of the CFAA Community.
- (b) The appointed Officers of the Commission shall be the CFAA Fiscal Officer, CFAA Program Manager, and Secretary. The CFAA Fiscal Officer, CFAA Program Manager, and Secretary shall be employed officers of the Association and shall not be subject to a limited term of office.

Section 2. The CFAA Commission Chair-Elect is elected by the CFAA Commission through majority vote at the last meeting of the fiscal year. In case of a tie vote, the Chair's vote will be counted. Nominations for Chair-Elect shall be submitted to staff on the proscribed form. Commissioners may self-nominate or nominations may be submitted by any Commissioner. The public member is ineligible to serve as an Officer on the Commission.

Section 3. The Commission Chair shall preside at all meetings of the CFAA Commission and perform such other duties as pertain to that office. He/she shall be an ex-officio member of all committees of the Commission and shall vote only in the case of a Commission or committee tie. The term of office shall be for one (1) year. Upon completion of the term as Commission Chair, such person shall become Immediate Past Commission Chair, also for a one (1) year term of office.

Section 4. The Commission Chair-Elect shall assist the Commission Chair and, in all ways, prepare for his/her term of office. In the absence or disability of the Commission Chair, he/she shall have all the powers and shall perform all the duties of the Commission Chair without prejudice to his/her term as Commission Chair. The CFAA Commission Chair-Elect is elected by the CFAA Commission through majority vote at the last meeting of the fiscal year. In case of a tie vote, the Commission Chair's vote will be counted. Nominations for Chair-Elect shall be submitted to staff on the proscribed form. Commissioners may self-nominate, or nominations may be submitted by any Commissioner. The public member is ineligible to serve as an Officer on the Commission.

The Commission Chair-Elect has a vote on the Commission and shall serve a one (1) year term of office. Upon completion of the one (1) year term as Commission Chair-Elect, such person shall become Commission Chair and serve until a successor is qualified. The Commission Chair-Elect serves as Parliamentarian for the CFAA Commission. In the event of a position vacancy, the Commission Chair-Elect shall be filled in the same manner as original selection.

Section 5. The Immediate Past Commission Chair shall assist the Commission Chair and participate in deliberations of the any Committees designated by the Commission. He/she has a vote on the Commission and shall serve a one (1) year term of office. In the absence or disability of both the Commission Chair and the Commission Chair-Elect, he/she shall have all the powers and shall perform all the duties of the Commission Chair. If the Immediate Past Commission Chair cannot perform the duties of that office, such duties would be carried out by the most recent preceding Past Commission Chair.

Section 6. The CFAA Fiscal Officer serves as the financial officer of the Commission. The Fiscal Officer shall be appointed by NASFAA's President. He/she shall be employed by NASFAA. The Fiscal Officer shall serve as an ex-

officio, non-voting member of the Commission. He/she manages the Commission's review of and action related to the Commission's financial responsibilities and works with the NASFAA President to ensure appropriate policies, procedures, record-keeping, and internal controls are utilized. He/she is responsible for managing vendor contracts for services relating to the CFAA, including a testing platform, psychometric needs, and marketing solutions. He/she shall hire, supervise and dismiss such other employees of the CFAA Program, with approval and oversight from the NASFAA President. The Fiscal Officer shall submit an Annual Report to the Commission and the NASFAA Association.

The Fiscal Officer shall not have access to CFAA exam content and will recuse himself/herself from any discussion related to exam item-level concerns and/or appeals. To prevent inadvertent exposure to exam items, this Officer shall not have access to any areas of the Testing Center that contain test items and shall not know the password utilized to password-protect any documents or other files containing test items. Based on this lack of access to exam content, which presents no opportunity for conflict of interest, the Fiscal Officer is *not* prohibited from conducting trainings that prepares potential candidates for the CFAA Exam.

Section 7. The CFAA Program Manager shall be responsible for the operation of the CFAA Program. The CFAA Program Manager shall be appointed by the NASFAA President. He/she shall be employed by NASFAA. He/she shall serve on the CFAA Commission in an ex officio non-voting capacity. He/she shall supervise such other employees of the CFAA Program. He/she shall perform such other duties as are consistent with the purposes of the CFAA Program and submit an Annual Report to the CFAA Commission and the NASFAA Association. This Officer is prohibited from conducting trainings that prepares potential candidates for the CFAA Exam.

Section 8. The Secretary shall be appointed by the CFAA Program Manager and shall serve at the will of the CFAA Program Manager. The Secretary shall serve as an ex-officio, non-voting member of the Commission, and shall be responsible for preparing minutes of all meetings of the CFAA Commission and for maintaining all relevant Commission records. This Officer is prohibited from conducting trainings that prepares potential candidates for the CFAA Exam.

Section 9. No two or more offices of the Commission may be held by the same person. For those elected Officers as specified in this Article, once elected, such Officer may serve for the duration of his/her term so long as he/she remains a CFAA in good standing.

## **STANDING RULE 6 – CFAA COMMITTEES AND TASK FORCES**

**Committees:** Committees are formed by the Commission and have continuing duties and/or responsibilities to consider and/or act on in certain matters related to the purposes of the CFAA Commission. These Committees shall be named and their specific purposes and responsibilities enumerated in the Standing Rules and Policies.

**Task Forces:** Task Forces are formed by the Commission to consider specific matters and/or complete specific tasks related to the purposes of the Commission and not otherwise assigned to standing committees. Task Forces are dissolved upon completion of their tasks.

**Selection:** Committee Chairs shall be appointed by the Commission Chair in consultation with the past Committee Chair and NASFAA Staff and are subject to the approval of the Commission. Task Force Chairs shall be appointed by the Commission Chair and do not require approval of the Commission. Committee or Task Force members shall be appointed by the Committee/Task Force chair with approval of the Commission Chair. Committee or Task Force chairs or members may be Commission members or CFAA volunteers. Committee or Task Force members are appointed for a one-year term, which may be renewed up to three (3) times. Committee appointments are staggered with approximately one-third of the committee members replaced each year.



Those interested in serving on a CFAA Committee or in a volunteer capacity must submit a Volunteer Service Form outlining their experience and their desire to serve.

A majority shall constitute a committee quorum, unless otherwise specified in CFAA Commission Standing Rules and Policies. A majority vote is required to approve an action at any meeting at which a quorum prevails.

## **STANDING RULE 7 – CFAA FINANCE**

Section 1. NASFAA is committed to continue to support the Commission and certification through assuring funds for activities essential to the maintenance and growth of the certification program, including ongoing operations, periodic funding needs (for example, job task analysis), and extenuating circumstances (for example, to redress a breach of security).

Section 2. NASFAA will maintain fiduciary oversight of the relationship between NASFAA and the CFAA Program.

Section 3. The fiscal year of the Certification Program will follow that of NASFAA and shall be from July 1 to June 30, inclusive.

Section 4. Fees shall be assessed and collected in such amounts and in such manner as may be prescribed by the CFAA Commission.

Section 5. The Program's finances shall be audited at the conclusion of each of the established fiscal years as part of the full NASFAA audit. Reports and findings will be made available to the Commission.

Section 6. The CFAA Commission will approve the CFAA budget NASFAA staff proposes, which will achieve a breakeven (or otherwise acceptable) financial position, including the anticipated projected costs for any projects essential to conducting effective and thorough certification and renewal activities (such as a job analysis study, psychometric review of test effectiveness, standard setting, etc.).

## **STANDING RULE 8 - DISSOLUTION OR FINAL LIQUIDATION OF THE CFAA PROGRAM**

Dissolution or final liquidation of the CFAA Program shall proceed as provided in NASFAA's Articles of Incorporation, Article Sixth.

## **STANDING RULE 9 - AMENDMENT OF STANDING RULES AND POLICIES**

These standing rules may be amended by a two-thirds (2/3) majority of the CFAA Commission, provided that each amendment shall have been proposed in writing to the CFAA Program Manager by (a) the CFAA Commission (b) a committee authorized by the Commission, or (c) a petition of twenty-five (25) CFAA holders in good-standing, and provided further, that a copy of the amendment(s) shall have been distributed to each member of the CFAA Community at least thirty (30) days before the vote is to be cast by the CFAA Commission. Revisions, additions or deletions of Policies require a simple majority vote. Unless otherwise specified, approval requires a simple majority vote.

**Policy #1**      **Subject: Volunteer Confidentiality and Security Data**  
**Date Adopted: March 13, 2019**

As the CFAA Commission administers a certification program, CFAA Commission members, committee members and volunteers will at times learn of confidential or sensitive information regarding CFAA applicants or certificants including, but not limited to, such information as test scores and disciplinary actions. This information is to be kept confidential and secure in perpetuity—even after active participation in the program has ended—and should only be discussed when necessary with other Commission or Committee members or staff, or as necessary in the context of a disciplinary proceeding. All Commission members, committee members and volunteers with access to such information shall sign a security/confidentiality agreement prior to commencing service on or for the Commission and shall retain Commission information only so long as necessary to complete any required tasks. Security/confidential agreements will be retained by the CFAA Program.

1. The agreement shall require these individuals to maintain in strict confidence any and all information related to commission discussions and decisions unless prior approval is given by the Chair or such information is made publicly available. This confidential information includes (but is not limited to) information related to the following:
  - Applicants and applications, both initial and recertification
  - Commission decisions and actions related to applications
  - Commission finances
  - Item bank and exam development
  - Disciplinary actions and appeals

Certification applications and candidates' performance on the CFAA examination shall remain confidential unless required by law. The CFAA Program will release exam application and pass/fail information to the applicant only, and only in writing.

The exceptions to this are the published list of CFAAs that the Commission makes available to the public and confirmation of CFAA status. This statement does not preclude the publishing of any certificant's name against whom disciplinary action has been taken.

2. The CFAA Program Manager is responsible for distribution, receipt and storage of the forms. The forms will be kept on file in accordance with NASFAA policy. All such confidential information shall be maintained in a safe and secure place, such as a locked file drawer or a protected electronic file, in accordance with NASFAA's privacy policies. Access to confidential files will be limited to CFAA Program staff. Reasonable steps will be taken to protect against inadvertent disclosure or theft of the information.
3. Upon termination of service with the Commission or one of its entities, the individual will destroy any confidential information received or acquired relating to the certification program and confirm the destruction with CFAA Program staff.
4. Any work done by an individual on behalf of the Commission is a work for hire and belongs to and remains the property of the Commission.
5. CFAA Commissioners must sign a nondisclosure agreement prior to beginning their term and being granted access to any confidential materials. Commissioners are prohibited from preparation or presentation of instructional materials designed to train on Title IV Aid regulations, with the exception

of internal institutional staff training to assist them with performing daily duties. Commissioners are also prohibited from preparation or presentation of instructional materials designed to prepare potential candidates for either NASFAA credentials or CFAA certification. The training prohibition applies for 18 months from the date their term on the Commission ends.

Prohibited activities include:

- a. serving as an adjunct for a NASFAA U online course;
- b. conducting a NASFAA Authorized Event;
- c. participating on a committee or task force responsible for conducting Title IV related training or reviewing Title IV related curriculum; or
- d. presenting on NASFAA webinars related to Title IV regulations.

Training events related to non-Title IV regulations are permissible. Requests for exceptions to the Title IV training prohibition should be addressed to the CFAA Program Manager for consideration on a case-by-case basis. For example, Title IV related content that is not included in the Exam Content Outline may be approved.

6. Volunteers involved in CFAA Exam development will be given limited access to confidential exam materials as needed to perform their exam development duties. All volunteers will sign a nondisclosure agreement prior to being granted access to any confidential materials. Volunteers who are exposed to exam content are prohibited from preparation or presentation of instructional materials designed to train on Title IV Aid regulations, with the exception of internal institutional staff training to assist them with performing daily duties. Volunteers are also prohibited from preparation or presentation of instructional materials designed to prepare potential candidates for either NASFAA credentials or CFAA certification. The training prohibition applies for 18 months from the from the volunteer's most recent exposure to test items.

Prohibited activities include:

- a. serving as an adjunct for a NASFAA U online course;
- b. conducting a NASFAA Authorized Event;
- c. participating on a committee or task force responsible for conducting Title IV related training or reviewing Title IV related curriculum; or
- d. presenting on NASFAA webinars related to Title IV regulations.

Training events related to non-Title IV regulations are permissible. Exceptions to the Title IV training prohibition may be considered by the CFAA Officers on a case-by-case basis. For example, Title IV related content that is not included in the Exam Content Outline may be approved.

Volunteers involved in CFAA Exam development will be ineligible to sit for any assessments or exams that may include test items that they were exposed to during the exam development process for 18 months from the volunteer's most recent exposure to test items.

**Policy #2      Subject:      Conflict of Interest**  
**Date Adopted:      March 13, 2019**

All Commission volunteers and staff agree not to engage in actions which may constitute an actual, apparent, or potential conflict of interest with the mission and activities of the Commission and will execute a conflict of interest statement. On such a conflict of interest statement, the individual will notify the Commission of any such conflicts of interest and any business, financial, personal, and/or organizational interests and affiliations which are or could be perceived to be a conflict of interest.

**Policy #3**      **Subject:**            **Commission Meetings**  
**Date Adopted:**   **March 13, 2019**

The CFAA Commission meets at least two times each year, at least once in-person. The Commission may hold teleconferences as needed. Twice per year, the Commission shall be provided the most recent available financial statement reflecting year-to-date operations and previous year-end figures by the CFAA Fiscal Officer. Minutes should reflect any actions taken in executive session.

**Policy #4**      **Subject:**            **Public Disclosure**  
**Date Adopted:**   **March 13, 2019**

CFAA Commission policies will be made publicly available with the exception of those policies the release of which could potentially jeopardize the security or integrity of the examination or the security or integrity of the program.

**Policy #5**      **Subject:**            **CFAA Committees**  
**Date Adopted:**   **March 13, 2019**

**Communications:** Committee chairs shall be responsible for the submission of written reports.

**Confidentiality:** All Committee and Task Force members are required to have signed a confidentiality agreement prior to starting service.

**Certification Status:** At the discretion of the Committee or Task Force chair, volunteers or committee members may be required to have earned the CFAA designation and remain in good standing.

**Duties:** The duties of Commission committee members shall be described in committee position descriptions. Commission Task Force member duties are defined in the creation of the task force. All Commission committee and task force members will abide by the CFAA Standing Rules and Policies.

**Standing Committees**

Pursuant to CFAA Commission Standing Rule #6, standing committees are formed by the Commission and their specific purposes, responsibilities, and compositions are to be enumerated in the Standing Rules and Policies.

**Policy #6**      **Subject:**            **Examination Development**  
**Date Adopted:**   **March 13, 2019**

All individuals involved with examination development shall follow established security and confidentiality measures as outlined in the CFAA Item-Writing Handbook. Concerns regarding a breach of this policy should be reported to the Commission Chair or the CFAA Program Manager. If the concern involves the Commission Chair, the concern should be reported to the Chair-Elect or the CFAA Program Manager. Concerns regarding a breach shall be considered a CFAA Policy Challenge and investigated in accordance with established procedures outlined in Policy #15.

A job task analysis study of the financial aid administration profession will be performed no less frequently than every five years. The study findings will serve as the foundation for the examination specifications. The examination specifications will be reviewed by a subset of subject matter experts. Any necessary adjustments

will be recommended to the Commission for review and approval. CFAA Commissioners shall not participate in job task analysis studies.

A body of literature aligned with the CFAA Exam Content Outline will be identified by the CFAA Commission and designated as the CFAA Exam Core Resources. The CFAA Commission will ensure that the CFAA Exam Core Resources list is reviewed periodically and in conjunction with the Job Task Analysis and revised at that time if appropriate.

Items written for the CFAA Exam item bank should be properly referenced to a current item from the CFAA Exam Core Resources.

All examination forms will be assembled in accordance with the examination specifications.

All test questions shall go through an initial question analysis and item performance review on a routine basis.

The passing standard shall be set using a criterion-referenced methodology. The CFAA Commission will approve the passing score.

Whenever examinee volumes permit, equating will be used to maintain the passing standard across different examination forms and to statistically adjust scores, as necessary, to compensate for differences in difficulty across examination forms.

**Policy #7      Subject:            CFAA Eligibility Criteria**  
**Date Adopted:    March 14, 2019**

The CFAA assessment system includes an eligibility application, a multiple-choice exam, and a recertification application.

### **Eligibility**

Candidates must submit an application that documents fulfillment of requirements in formal education, professional experience and knowledge relating to financial aid administration, and professional ethical conduct as follows:

#### **1. Education**

All candidates must have earned a bachelor's degree from an accredited institution of higher education.

#### **2. Combination of Professional Experience and Demonstrated Knowledge**

CFAAs must be current or recent financial aid office employees of eligible institutions, or individuals with sufficient combination of experience and/or demonstrated knowledge related to the administration of Title IV aid at eligible institutions. "Eligible institutions" are institutions of postsecondary education that are eligible for Title IV Federal Student Aid, as identified on the U.S. Department of Education's Federal School Code List.

Candidates must document a sufficient combination of professional experience and/or demonstrated knowledge related to financial aid administration, using the following guidelines:

- Five years or more of professional financial aid experience;
- Three years or more of professional financial aid experience and at least seven NASFAA credentials;
- One year or more of professional financial aid experience and at least twelve NASFAA credentials;

- Earned a graduate degree in a financial aid related program; or
- Any other combination of experience and demonstrated knowledge deemed sufficient by the Commission, including but not limited to:
  - Part-time or work-study employment in the financial aid office;
  - Students seeking a career in financial aid administration;
  - Higher education professional seeking to move from within another student services area; or
  - Consultants or retirees with prior financial aid office experience.

All qualifying professional experience must be complete at the time the application is submitted. Candidates will be required to upload a current resume as part of the application process.

### 3. Professional Conduct

Candidates must agree to adhere to NASFAA’s [Code of Conduct](#) and uphold NASFAA’s [Statement of Ethical Principles](#). To qualify, the CFAA candidate must not:

- be in default on a Title IV loan or owe an overpayment of Title IV funds;
- have been engaged in the misuse of government funds;
- have been determined to have committed fraud or other legal violation involving government funds;
- have been suspended or debarred by a federal agency; or
- have a felony conviction related to the acquisition, use, or expenditure of federal, state, or local government funds.

### 4. Exam

After being determined eligible, candidates must pass a multiple-choice exam administered in a single two-hour time frame. The test will be completed online in NASFAA’s testing center and will be monitored remotely by trained proctors. Upon submission, the candidate will immediately find out whether or not they passed the test within the testing center. For security reasons, results will not be given over the phone or sent by fax or email. Candidates will be instructed to return to the testing center to review their results.

#### Certification Period

After successful completion of the exam, candidates become certified for a period of three years, based on the date they pass the exam.

#### Exam Retake

A candidate who does not pass the CFAA Exam on the first attempt may request approval to retake the CFAA Exam and pay the CFAA Exam Retake fee, which cannot be taken within the same testing window as the candidate’s first attempt. Only one exam retake is allowed within the exam eligibility period, which is one year from the date the candidate’s initial application was approved. The CFAA Exam may be attempted only twice within a 12-month period. The candidate must start the application process over again if the CFAA Exam is not taken within the candidate’s one-year exam eligibility period, or if the candidate does not pass the retake exam.

**Policy #8**      **Subject:**            **CFAA Recertification Eligibility Criteria**  
**Date Adopted:**    **May 17, 2019**

#### Recertification

In the judgment of the Commission, recertification is required every three (3) years due to the rate of change in the profession and the need to stay current in financial aid practices. Recertification applications or inactive status requests must be submitted on or before the anniversary that the CFAA exam was passed.

The recertification application documents (a) ongoing adherence to professional conduct requirements, and (b) completion of continuing education activities and contributions to the profession:

- Recertification applicants must have completed a minimum of 60 Recertification Points (RPs), representing financial aid related continuing education, qualifying leadership, instruction, authorship, advocacy, and other activities contributing to the profession. Refer to recertification point system table in Appendix B for a list of qualifying activities.
- Candidates who exceed recertification expectations by earning over 100 Recertification Points (RPs), representing financial aid related continuing education, qualifying leadership, instruction, authorship, advocacy, and other activities contributing to the profession during the recertification period, will receive special recognition.
- Recertification applicants must again agree in writing that they will adhere to the CFAA Code of Conduct and uphold NASFAA’s Statement of Ethical Principles.
- To qualify to recertify, the CFAA candidate must not:
  - be in default on a Title IV loan or owe an overpayment of Title IV funds;
  - have been engaged in the misuse of government funds;
  - have been determined to have committed fraud or other legal violation involving government funds;
  - have been suspended or debarred by a federal agency; or
  - have a felony conviction related to the acquisition, use, or expenditure of federal, state, or local government funds.

All points must be earned within the three-year recertification period, unless the candidate is approved for inactive status. Candidates must be prepared to submit documentation to validate qualifying recertification points.

### **Inactive Status**

Inactive Status is available to CFAAs who do not meet their renewal eligibility requirements, but who do not wish to permanently lose their certification status. Inactive status provides CFAAs with a one-year period beyond their period of active certification in which to meet the renewal eligibility requirements.

While an individual’s status is inactive, the CFAA credential and designation MAY NOT be used.

To apply for inactive status, certificants must complete the appropriate form and pay the inactive status fee. Applications must be received prior to the end of the certification period for the request to be honored. Applicants may not apply for consecutive inactive status.

### **Reactivation**

The CFAA certification may be reactivated at any time during the inactive period as long as the renewal requirements are met. Reactivation will be approved by meeting the renewal requirements including payment of appropriate fees and fulfilling recertification activity requirements or by re-examination. Any remaining recertification points must be accrued within the one year leading up to the resumption of certified status.

**Policy #9      Subject:            Reasonable Accommodations Pursuant to the ADA**  
**Date Adopted:    March 13, 2019**

Accommodations for testing shall be provided without charge to candidates who provide proof of (a) a disability as defined by Title III of the Americans with Disabilities Act, or (b) special medical needs. A “Testing Accommodations Request Form” with a written explanation of the candidate’s required accommodations

specific to the CFAA Exam and detailed supporting medical documentation from a qualified medical professional for this specific purpose, detailing the needed accommodation given the format and nature of the exam. Requests must be submitted at least eight weeks prior to an exam testing window.

The CFAA Program will endeavor to furnish the requested accommodations, provided that the request is made by the required deadline, and that the accommodation would not fundamentally alter the measurement of the skills or knowledge the examination is intended to test and would not result in an undue burden.

**Policy #10      Subject:            Examination Administration and Security**  
**Date Adopted:    April 17, 2019**

1. The CFAA examinations are administered during established testing windows.
2. Candidates are notified of examination registration options at least eight weeks prior to the examination. Candidates must register for the examination and schedule a remote proctoring session.
3. A candidate who is more than 15 minutes late to their designated examination appointment may forfeit their ability to take the test that day. It may be possible to reschedule the exam within the current testing window, subject to remote proctor availability.

The CFAA exam is administered online and is proctored remotely.

**Testing Requirements for CFAA Exam**

The examinee must meet the following criteria:

1. Display a valid, unexpired government-issued photo ID to verify identity.
2. Private, well lit room, with a door that can be shut.
3. Only one person (the candidate) may be in the room.
4. Workspace must be clear of paperwork. All books, binders and notes must be removed from the candidate's reach.
5. There should be no material relating to the examination on the walls, floor, ceiling, or desk in the room.
6. No communication devices, including phones, should be available to candidates for the duration of the exam, unless a device has been pre-approved to accommodate a disability.
7. The candidate may not leave the room during the two-hour knowledge exam. Leaving the room during the exam may be grounds for immediate termination of the exam and invalidation of the test results. Bathroom breaks are not permitted.
8. The candidate may not use devices with memory capabilities. Audible beepers, cellular phones, tablets, or books or papers will not be allowed in the testing room.
9. All work must be completed online. An online 4-function calculator will be available within the testing center. Note taking is prohibited during the exam.
10. This is a closed-book exam. It is not permitted to access reference materials during the exam.
11. The candidate must not copy or retain test questions or transmit them in any form to any other person or organization.
12. The candidate is allowed to have a drink in a spill-proof container with no label.
13. The candidate must meet the following technological requirements:
  - a. Desktop computer or laptop (tablets, Chromebook and cell phones do not meet our requirements).
  - b. Only one monitor is permitted during the exam. Other monitors must be powered off.
  - c. A working built-in or external webcam and microphone.
  - d. Internet speed must be at least 2 Mbps download and 2 Mbps upload; 10 Mbps is strongly recommended for optimal performance. Hot spots are not recommended. Test internet speed at: <https://www.speedtest.net/>.



- e. Browser with pop-up blocker disabled ([see instructions here](#)).
  - f. Do not use Internet Explorer to take the exam, Google Chrome or Firefox are recommended.
14. Technical issues encountered during the exam may require rescheduling of the exam. The candidate must contact NASFAA to reschedule the exam ([cfaa@nasfaa.org](mailto:cfaa@nasfaa.org)).

The remote proctor must meet the following criteria:

1. Remote proctors must adhere to the CFAA Remote Proctor Guide
2. The proctor must check the candidate's testing area as follows:
  - a. There should be no material relating to the examination on the walls, floor, ceiling, or desk in the room.
  - b. No other persons are to be present in the room other than the candidate.
  - c. All books, binders and notes must be removed from the candidate's reach.
  - d. The desk area is clear of any paperwork/clutter.
  - e. No radios/music/television devices on in the background.
  - f. No communication devices, including phones, should be available to candidate for the duration of the exam, unless a device has been pre-approved to accommodate a disability.
  - g. Check that the Remote Proctor Guide is available and ready for test administration.
  - h. Candidate will have access to a basic 4-function calculator (non-programmable) and note-taking within the testing center.
3. Prior to beginning a candidate's exam, the proctor must:
  - a. Request the candidate's valid, unexpired government-issued photo ID to be displayed for the proctor to confirm identity.
  - b. Ensure the candidate's exam environment is appropriate for the examination.
  - c. Once the candidate feels comfortable, they can go ahead and log into their examination.
  - d. The candidate will be prompted to read the online statement of ethical conduct for a candidate, which also will have examination instructions.
  - e. Answer any questions the candidate may have at this time, and then allow them to begin.
  - f. If a candidate does not appear for their examination within 15 minutes of their scheduled start time, the exam window will be closed and the candidate must contact NASFAA to reschedule the exam ([cfaa@nasfaa.org](mailto:cfaa@nasfaa.org)).
4. All Proctors must promptly communicate any concerns and/or confusions to the candidates as the situations are encountered. In the event communication of any concerns is provided to the candidate, this needs to be documented on the irregularity report.

Examination administration and security procedures shall be provided in writing to all candidates prior to the examination. The Commission shall take appropriate action regarding any reported violation of the examination administration and security policies as outlined in policies.

**Policy #11      Subject:            Testing Arrangements for Extraordinary Circumstances**  
**Date Adopted:    March 13, 2019**

If a candidate is unable to access the testing website because of extraordinary circumstances, such as inclement weather, terrorist acts, technical issues beyond the candidate's control, or a natural disaster, then the candidate will be allowed to reschedule their exam. It may be possible to reschedule the exam within the current testing window, subject to remote proctor availability. Otherwise the exam will need to be taken during the next available testing window. The candidate should contact NASFAA at [cfaa@nasfaa.org](mailto:cfaa@nasfaa.org) as soon as possible to request to reschedule the CFAA Exam.

**Policy #12**    **Subject: Remote Proctor Criteria**  
**Date Adopted: March 13, 2019**

The CFAA Commission will contract with a third party remote proctoring vendor to monitor candidates completing the CFAA Exam. The vendor will ensure their proctors are well trained and facilitate an experience for exam candidates to write exams under similar and secure conditions. CFAA remote proctors are required to read the CFAA Remote Proctor Guide and have it available during the exam period.

Individuals who could have a conflict of interest cannot serve as proctors, including but not limited to:

- Current members of the CFAA Commission
- CFAA Exam Item Writers and Reviewers
- Anyone who has a familial or an employment relationship with any candidate may not serve as that candidate's proctor.

**Policy #13**    **Subject: Fees**  
**Date Adopted: March 13, 2019**

The Commission shall approve all fees and review them annually. A schedule of fees is attached as Appendix A to the policy manual.

**Initial Application**

All CFAA applicants must pay the initial non-refundable application processing fee.

**Examination Fee**

Once an applicant is determined eligible to sit for the exam, the candidate will receive a link with the ability to purchase the test. The fee will cover the cost of one examination that is to be taken within one (1) calendar year of the application acceptance.

**Reexamination Fee**

If a candidate is unsuccessful on their first attempt of the examination, they may purchase an additional examination attempt to be used within one (1) calendar year of the application acceptance.

**Recertification**

The non-refundable processing fee for CFAA recertification is due when the Recertification Application is submitted at the end of each CFAA Designation period.

**Inactive Status**

This non-refundable process fee for CFAA inactive status is due when the Inactive Status Application is submitted at the end of the certification period.

**Reactivation Status**

This non-refundable process fee for CFAA reactivation status is due when the Reactivation Status Application is submitted at the end of the inactive period.

**Policy #14**    **Subject: Use of the Certification Title and Initial Designation**  
**Date Adopted: March 13, 2019**

Individuals who are currently certified may use the title "Certified Financial Aid Administrator<sup>TM</sup>".

The title and designation may not be used to imply that an institution or office is certified.

Use of the title and designation by individuals who have not been awarded the certification or who have failed to maintain their certification is expressly prohibited.

The designation "Certified Financial Aid Administrator™" is trademarked by NASFAA and its use is subject to approval by the CFAA Commission.

**Policy #15      Subject:            Revocation or Other Disciplinary Actions**  
**Date Adopted:    March 13, 2019**

A Certificant may have his/her certification revoked or other disciplinary action taken for violation of CFAA Program policies including but not limited to:

- Violation of the NASFAA Code of Conduct;
- Violation of examination procedures or security (outlined in Policy 9);
- A material misstatement on an application for initial certification, recertification application, reactivation application or in any of its representations to the Commission, or other information related to professional practice, whether intentional or unintentional;
- Failure to disclose a conviction of a felony;
- Misrepresentation or improper use of the certification;
- Failure to pay program fees on a timely basis.

In addition to the above violations, a Certificant may have his/her certification revoked or other disciplinary action taken for specific enforceable behaviors.

In the course of applying for certification or renewal, Candidates/Certificants shall be made aware of the basis for which certification can be revoked.

NASFAA's Ethics Commission, with CFAA Commission representation, shall be empowered to investigate, deliberate, and recommend a resolution for all Complaints against Candidates and Certificants. NASFAA's Ethics Commission shall follow the NASFAA Code of Conduct Enforcement Procedures.

The CFAA Commission is the only entity authorized to make final decisions with respect to revocation or other disciplinary actions related to CFAA designation. The CFAA Commission will take into consideration the findings and recommendation of NASFAA's Ethics Commission.

### **Disciplinary Actions**

**a) Types of Disciplinary Actions.** The following disciplinary actions may be recommended to the CFAA Commission by NASFAA's Ethics Commission based on the findings of their investigation. The CFAA Commission will impose the sanction(s) they deem appropriate.

**i) Private Sanction Disciplinary Actions**

- (1) **Statement of Concern.** A statement of concern is a formal written statement by the CFAA Commission addressed to the Respondent; there is no publication of a statement of concern. A statement of concern is appropriate where a complaint has not been closed earlier with no investigation, where NASFAA has found a likely violation of the CFAA Program Policies, but

- where the violation was relatively minor and likely not recurring and/or the Commission has received acceptable assurances that suitable corrective action has been taken or is being taken.
- (2) Reprimand. A reprimand is a formal written rebuke by the CFAA Commission addressed to the Respondent; there is no publication of a reprimand. The recommendation of a reprimand may include a recommendation for NASFAA or other education or training pertinent to the violation.
  - (3) Refer the matter to the proper authorities for criminal prosecution, if appropriate.
  - (4) Take any other action that is warranted under the circumstances.
- ii) **Public Sanction Disciplinary Actions**
- (1) Suspension. Suspend the Respondent's CFAA status for an appropriate period of time. If the Respondent had yet to earn their CFAA designation, the candidate may not be allowed to apply to become a CFAA for an appropriate period of time, including permanently, if necessary.
  - (2) Revocation. Revoke the Respondent's CFAA status permanently.
- iii) **Multiple Sanctions.** The CFAA Commission may apply more than one sanction as deemed appropriate.

### **Public Notice of Sanction**

The names of all suspended and revoked Certificants as determined by the Commission shall be included in an annual report that is publicly available on the CFAA Program website, and other appropriate locations as reasonably determined by the Commission. The report may also include cumulative and/or redacted reports of Private Sanctions of the Commission if the Commission decides such reports may serve as guidance to other Certificants.

- a. **Notice of Public Sanction available upon request.** Upon request for additional information regarding the violation, the CFAA Program Manager shall consult with the CFAA Commission Chair, NASFAA's Ethics Commission Chair, and legal counsel to determine if the request for additional information will be honored.

### **Appeals Provisions**

A Respondent that has been found by the hearing panel to have violated the NASFAA Code of Conduct and had a public sanction imposed has the right to appeal to the NASFAA Board of Directors, following the process outlined in [NASFAA's Code of Conduct Enforcement Procedures](#). If the appeal impacts a CFAA holder or candidate, NASFAA's Ethics Commission will notify the CFAA Commission of the outcome. The CFAA Commission will review the determination, take any necessary action, and ensure appropriate records are maintained.

A Respondent with concerns related to CFAA Commission-imposed public sanctions has the right to appeal to the CFAA Commission, following the process outlined below.

1. A Respondent's notice of appeal must be filed with the CFAA Commission no later than thirty (30) calendar days after the date of the notice of the Commission's decision and must state the grounds for the appeal.
2. The CFAA Commission Chair will establish the time and place for the appeal, as well as the procedures for the appeal, and notice will be provided to the Respondent.
3. The CFAA Commission will not re-try the facts of the hearing but will limit its review to a determination whether NASFAA, the Ethics Commission, or the CFAA Commission followed appropriate procedures.
4. Written notice of the appeal determination of the CFAA Commission will be provided to the Respondent and the Complainant by traceable delivery.

## Confidentiality and Record-Keeping of Proceedings in Revocation or Other Disciplinary Actions Matters

### b) Confidentiality

- a. **Disclosure of Complainant and Certificant names.** The names and addresses of Certificant, and Complainant if necessary, shall be disclosed to the CFAA Program Manager, CFAA Program legal counsel, NASFAA's Ethics Committee, and the Chair and Past Chair of the CFAA Commission, and additionally as necessary in the course of proceedings to the members of the CFAA Commission, and any experts enlisted to assist in investigation and consideration of the matter.
- b. **Confidentiality Attestation.** All individuals enlisted by, or on behalf of, NASFAA's Ethics Commission to investigate, consider or deliberate as part of these processes shall sign an appropriate statement setting forth their agreement to maintain all information as confidential, and to promptly return all information received during the course of an investigation to the CFAA Commission's offices care of the CFAA Program Manager.
- c. **Handling of information related to the Complaint and proceedings.** All information, other than that which is publicly available, related to and disclosed during the proceedings shall be maintained on a confidential basis, except that the CFAA Program Manager, NASFAA's Ethics Commission and/or the CFAA Commission shall be permitted to:
  - i. Disclose such information when compelled by a validly issued subpoena or court order, or when otherwise required by law or pursuant to permission granted by the individual in question;
  - ii. Share relevant information with parties essential to the review and investigation of the alleged unethical or unprofessional conduct, including the CFAA Commission's staff, legal counsel, and consultants or experts;
  - iii. Utilize such information in anonymous and aggregate form for purposes deemed appropriate by the Commission and/or NASFAA's Ethics Commission, including, but not limited to, public reports, Certificant education, and research purposes.

### c) Record Keeping

- a. **Handling, storage, maintenance, and destruction of records.** The CFAA Program Manager, with the guidance of the CFAA Commission and NASFAA's Ethics Commission, shall establish reasonable procedures to ensure that confidentiality is maintained with respect to the handling, storage, maintenance, and destruction of records.
- b. **Recording of Complaints in Certificant records.** All CFAA related Complaints become a part of the record in the Certificant's file to be held in the CFAA Commission's offices. The record shall include the steps undertaken in the due process review and any action taken, including notation of Complaints dismissed for lack of merit.
- c. **Retention of records for closed cases.** Once the case is closed, dismissed, or otherwise reaches conclusion, one set of records shall be maintained as part of the program's permanent records and the remainder destroyed.

**Policy #16**      **Subject:**            **CFAA Program Queries, Challenges and Appeals**  
**Date Adopted:**    **March 13, 2019**

Queries and potential challenges of a CFAA applicant, candidate or certificant must be submitted to [cfaa@nasfaa.org](mailto:cfaa@nasfaa.org) within thirty (30) days of receipt of notification of an adverse decision. NASFAA CFAA Program staff will review all queries and provide guidance to the extent appropriate. If the query constitutes a challenge, the CFAA Program Manager or designee shall notify the Commission Chair of the challenge within ten (10) business days.

The following circumstances constitute a challenge:

- the CFAA Commission’s interpretation of eligibility and recertification requirements;
- exam administration procedures;
- testing conditions severe enough to cause a major disruption of the examination process; and
- accuracy of exam content and/or keyed item responses.

The CFAA Commission shall then meet by teleconference within thirty (30) days of receipt of notification of the challenge by the CFAA Commission Chair. All determinations regarding challenges must be decided by a two-thirds (2/3) vote of the CFAA Commission.

Notice of the CFAA Commission’s determination shall be provided to the Challenger within ten (10) business days of the decision.

The Challenger then has thirty (30) days from receipt of the CFAA Commission’s determination to file one follow-up written appeal with the CFAA Commission. To appeal the Commission’s determination, the Appellant must submit a written appeal to the CFAA Program Manager or designee. CFAA Program staff shall notify the Commission Chair of the appeal within ten (10) business days. The appeal shall be considered at the next regularly scheduled meeting of the CFAA Commission. All determinations regarding appeals must be decided by two-thirds (2/3) vote of the CFAA Commission. Notice of the Commission determination shall be provided in writing to the Appellant within ten (10) business days of the Commission meeting.

The CFAA Commission’s determination shall be final.

**Policy #17      Subject:          Records Retention**  
**Date Adopted:    March 13, 2019**

The CFAA Commission will retain documents in accordance with its record retention policy set forth below. Electronic retention policies are the same as for hard copy. Electronic files shall be regularly backed up.

Policies relating to document retention specific to revocation or other disciplinary actions are set forth in Policy #14, Revocation and Other Disciplinary Actions, above.

Communications containing legal advice should be marked “Confidential and Privileged” and clearly identify the authors or recipients as lawyers. Employees or volunteers should not distribute documents containing privileged attorney-client information without specific authorization from the attorney.

Documents should not be retained past the designated times set forth in this policy. In addition, all paper and electronic files should undergo periodic review by staff, at least annually, to ensure compliance with this policy.

Should the Commission or NASFAA be engaged in litigation or receive a subpoena for documents, the Record Retention Policy may be suspended on advice of legal counsel. The destruction of any documents in such circumstances may be inappropriate.

<b>Document Type</b>	<b>Retention Period</b>
Standing Rules & Board Policies	Permanent
Regular and executive session minutes	Permanent
Regular and executive session agendas	6 years
Board Reports and related documents	6 years
Commission Committee documents	10 years

Budgets	7 years
Financial Records	7 years

**Correspondence**

Any outgoing official correspondence on behalf of the Commission that expresses or explains an official position or policy must be forwarded or copied to the [cfaa@nasfaa.org](mailto:cfaa@nasfaa.org) inbox, and should be kept permanently, along with related incoming correspondence. NASFAA staff will produce a PDF version of the email correspondence and save to the Training Drive, along with any attachments.

<b>Legal</b>	<b>Retention Period</b>
Claims and litigation	Permanent
Contracts	Permanent
Contracts – drafts	Discard after final contract is signed
Correspondence – legal	Permanent
Trademark registrations and copyrights	Permanent

<b>Certificant</b>	<b>Retention Period</b>
Directory	Permanent
Applications	Permanent
CFAA Exam Items and Answers	5 years
Revocation proceedings documents	Permanent

<b>Elections</b>	<b>Retention Period</b>
Nomination and election files	Discard after need no longer exists

**Examination Development**

All documents related to the development and maintenance of the examination will be maintained permanently following established security policy measures in Policy #6. These documents include, but are not limited to, job analysis studies, cut score (standard setting) reports, documentation of item writing activities, exam forms, and technical reports.

The item bank used to develop the CFAA exam will be maintained permanently by the Commission or its designated vendor.

**Assessment Results**

Test scores for all candidates and related documents to determine test cut-scores and psychometrics shall be maintained by the Commission or its designated vendor in a secured environment for five (5) years.

**Policy #18      Subject:            Quality Improvement**  
**Date Adopted:    March 13, 2019**

The CFAA Commission is committed to conducting periodic reviews of standing rules, policies and other program and candidate materials to facilitate the ongoing quality and maintenance of the CFAA Program. Accordingly, an annual audit will be conducted and reported by the Commission in the minutes.

The published list of Certified Financial Aid Administrators™ will be updated following the completion of each exam administration. A database of all CFAA applicants and certificant will be maintained.

### **Vendor Contracts**

The CFAA Commission will periodically review any agreements with consultants and/or other vendors to ensure that those agreements continue to meet the needs of the certification program. Additionally, security clauses will be included in contracts dealing with confidential information.

### **Security**

Certification program staff will periodically review the certification program security practices to ensure compliance.

**Policy #19**      **Subject:**            **Security**  
**Date Adopted:**   **March 13, 2019**

The CFAA Certification Commission Security Policy is a confidential document. To ensure the security of all confidential materials the policy will NOT be published or made available to CFAA applicants, certificants or the public.

**Policy #20**      **Subject:**            **Finance**  
**Date Adopted:**   **March 13, 2019**

The CFAA Commission shall follow NASFAA policies for fiscal management.

### **Budget:**

The CFAA Fiscal Officer shall prepare the budget for certification program operations, as outlined by NASFAA budget requirements. The Commission shall be made aware of the certification budget.

### **Fundraising:**

The CFAA Commission shall not engage in fundraising or activities outside the scope of certification and renewal activities.

### **Contracts:**

The CFAA Fiscal Officer shall use established vendors or the RFP process to contract services for the job analysis; exam development, maintenance, and administration; and other related services. The Commission shall be made aware of contracts.

### **Financial Statements:**

Financial Statements shall be distributed to the full Commission semi-annually in the second and fourth quarters of NASFAA's fiscal year.

### **Fiscal Year:**

The Commission fiscal year shall coincide with the fiscal year of NASFAA, which is July 1 – June 30.

**Policy #21**      **Subject:**            **CFAA Recertification "Other Activities" Approval Process**  
**Date Adopted:**   **May 17, 2019**

A CFAA recertification candidate may submit an activity or event not already identified on the list of approved recertification activities to be reviewed by the CFAA Program Manager and CFAA Commission Chair in consideration of points for recertification on the proscribed form. The CFAA Program Manager and CFAA Commission Chair will review and respond to the request within ten (10) business days.



The CFAA Program Manager and Commission Chair will take into account the level of educational and professional advancement provided by the activity. They will also consider the contribution the activity provides for financial aid administration. If they find that the activity has a significant benefit associated with it, it will be an approved activity for recertification. The CFAA Program Manager and Commission Chair will also determine an appropriate amount of points that will be awarded for completing the activity.

The CFAA Program Manager and Commission Chair shall bring the activity to the full Commission for review and consideration if the activity may be eligible for 5 or more points or is worthy of full Commission consideration. The CFAA Commission shall review the request at the next scheduled Commission meeting. All determinations regarding activity requests must be decided by a two-thirds (2/3) vote of the CFAA Commission. Notice of the CFAA Commission's determination shall be provided to the applicant within ten (10) business days of the decision.

The Commission reserves the right to approve activities on a case-by-case basis.

## Appendix A: Program Fees

The following information relates to the fees associated with CFAA Program:

- All fees are nonrefundable.
- A candidate who does not pass the CFAA Exam on the first attempt may request approval to retake the CFAA Exam and pay the CFAA Exam Retake fee, which cannot be taken within the same testing window.
- Only one exam retake is allowed within the exam eligibility period, which is one year from the date the candidate's initial application was approved.
- The CFAA Exam may be attempted only twice within a 12-month period.
- The Recertification fee applies to CFAA holders who renew the designation before the holder's three-year CFAA designation period expires.
- If a CFAA becomes inactive, the Recertification fee would not be required; instead the Inactive Status fee and Reactivation fees will apply.
- The candidate must start the application process over again if the CFAA Exam is not taken within the candidate's one-year exam eligibility period, or if the candidate does not pass the retake exam, or if the CFAA holder does not recertify or is not placed on Inactive Status before the three-year CFAA designation period expires.
- Fees are subject to change.

### CFAA Program Fees Effective February 2019

Fee Type	Fee
Application	\$50
CFAA Exam	\$375
CFAA Exam Retake	\$275
Recertification	\$300
Inactive Status	\$250
Reactivation	\$150

## Appendix B: Recertification Point System Summary Table – as of March 27, 2019

<b>CFAA Recertification Point System</b>	
<i>A minimum of 60 Recertification Points (RPs) must be earned within the recertification period, unless candidate is approved for inactive status. Candidate must be prepared to submit documentation to validate qualifying recertification points.</i>	
<b>Financial Aid Related Training</b>	
Credential Earned (during the re-certification period)	10/credential
Institute/Bootcamp (Federal/State/Regional/Industry week-long immersive training)	10/event
Fundamentals of Student Financial Aid Administration (FSA)	10/event
NASFAA U Online Courses (successful completion required)	4/course
NASFAA Authorized Event Workshop (independent of an Institute/Bootcamp)	3/topic
Attendance at a Pre-Conference Workshop at National, State, or Regional Association Conferences	3/event
FSA Coach - Online Self-Paced Tutorials	2/tutorial
Financial Aid Training or Policy Webinars (FSA/NASFAA/Regions/States)	1/webinar
Other - Subject to review and approval by the CFAA Commission (refer to Policy #21)	Varies
<b>Attendance at Professional Conferences</b>	
Federal Student Aid (FSA) Training Conference	10/conference
NASFAA National Conference (in-person or NASFAA Live)	10/conference
NASFAA Leadership and Legislative Conference	8/conference
Professional Management Training (multi-day intensive leadership/management course or event)*	7/event
Regional Association Annual Conference	6/conference
College Board Annual Forum	6/forum
NACUBO (National Association of Colleges and University Business Officers) National Conference	6/conference
AACRAO (American Association of Collegiate Registrars and Admissions Officers) National Conference	6/conference
NACAC (National Association of College Admissions Counseling) National Conference	6/conference
NASPA (National Association of Student Personnel Administrators) National Conference	6/conference
AAMC (Association of American Medical Colleges) National Conference	6/conference
APC (Association of Proprietary Colleges) Innovation Summit	6/summit
Regional Leadership/Management Training	5/event
State Association Annual or Bi-Annual Conference	4/conference
College Board Colloquium	4/colloquium
NACUBO Student Financial Services Conference	4/conference
Higher Education Financial Wellness Summit	3/summit
State/Regional Association Single-Day Conference/Training	2/event
Other - Subject to review and approval by the CFAA Commission (refer to Policy #21)	Varies
<b>Advanced Degree(s) and Coursework</b>	
Doctorate degree in a financial aid related discipline (for example, Higher Education Administration)	40/degree conferred
Master's degree in a financial aid related discipline (for example, Higher Education Administration)	20/degree conferred
Post-baccalaureate course in a financial aid related discipline (successful completion required)	3/course
Obtain financial aid related certificates and certifications	Varies
Other - Subject to review and approval by the CFAA Commission (refer to Policy #21)	Varies

<b>Leadership, Engagement and Recognition</b>	
Elected leadership service at national level	15/position/year
Elected leadership service at the state/regional level	10/position/year
Committee or Task force appointment at the national level	4/position/year
Committee or Task force appointment at the state/regional level	3/position/year
Awards or personal recognition given to individual	5/award
Other - Subject to review and approval by the CFAA Commission (refer to Policy #21)	Varies
<b>Speaking and Instruction</b>	
Instruction at Institute/Bootcamp	15/event
Instruction at a NASFAA Authorized Event Workshop	5/topic
Instruction at Pre-Conference Workshop	5/event
Conference presentation at national, state, or regional level	2/presentation
Webinar training presentation	2/presentation
NASFAA U Online Course Adjunct	6/course
Other - Subject to review and approval by the CFAA Commission (refer to Policy #21)	Varies
<b>Authorship</b>	
Author a peer-reviewed article on a financial aid related topic that is published	3/article
Other - Subject to review and approval by the CFAA Commission (refer to Policy #21)	Varies
<b>Advocacy</b>	
Visit with federal legislators and policymakers	3/visit
Visit with regional and/or state legislators and policymakers	2/visit
Other - Subject to review and approval by the CFAA Commission (refer to Policy #21)	Varies

\* Examples of Professional Management Training: ATD (Association for Talent Development), Harvard Business Review, College/University Leadership Symposium, Disney Institute Leadership and Business Training, etc.

**The National Association of Student  
Financial Aid Administrators (NASFAA)  
provides professional development  
for financial aid administrators;  
advocates for public policies that  
increase student access and success;  
serves as a forum on student financial  
aid issues, and is committed to  
diversity throughout all activities.**

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