



## **National Commission for Certifying Agencies**

*The Accreditation Body of the Institute for Credentialing Excellence*

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To: Office of Management and Budget

From: Institute for Credentialing Excellence

Anjali Weber

Director of Accreditation Services

Date: May 5, 2014

Thank you for the opportunity to provide comments to the OMB circular a-119 proposed revisions. In these revisions, we note that there is more focus on the use of voluntary consensus standards as well as criteria for participation and in selection of the appropriate standard and procedure for conformity assessment, or personnel certification accreditation.

The Institute for Credentialing Excellence, or ICE, is a professional membership association that provides education, networking, and other resources for organizations and individuals who work in and serve the credentialing industry. ICE is a leading developer of standards for both certification and certificate programs and it is both a provider of and a clearing house for information on trends in certification, test development and delivery, assessment-based certificate programs, and other information relevant to the credentialing community. The National Commission for Certifying Agencies, or NCCA, is the accrediting body of ICE.

The current NCCA Standards were created from Department of Labor grant in the mid-1970s to identify criteria that guide the development, maintenance, and oversight of certification programs initially in the healthcare industry and were the first personnel certification standards. The NCCA standards have a heavy emphasis on quality and integrity of a certification program with standards covering governance, public protection and transparency, validity and reliability of assessments, and requirement for ongoing recertification. Though quality certification increased recognition and elevates a profession, a primary mission is the protection of the public and consumer safeguards to do no harm.

The NCCA Standards are comprehensive and address processes and are applicable universally for personnel certification. NCCA accreditation has been granted for many different industries, including nursing, occupational therapy, financial planning, crane operation, national security, and athletic training. NCCA currently accredits over 300 programs across approximately 130 organizations, covering about 50 industries. There is a rigorous peer review process that analyzes the administrative, psychometric, and public aspects of each program. Program content validity is demonstrated with a



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comprehensive job analysis conducted and analyzed by experts, with data gathered from stakeholders in the occupation or industry. Autonomy in governance and protection against undue influence are integral to the Standards and protect integrity. Responsibilities to the public and other stakeholders are demonstrated by fair policies and transparency.

ICE is currently working with a number of agencies within the Department of Defense Intelligence and Security communities, and two programs have already achieved national accreditation with another eight programs planned. The NCCA standards were selected jointly by the Offices of the Director of National Intelligence and the Undersecretary of Defense for Intelligence and a third party, and their certification programs have been built to the NCCA standards.

We appreciate the recognition that there is value to having choice in third party accreditation to best suit the needs of the program to maintain validity, reliability, fairness, and equivalence - and therefore, quality. Each industry is unique, and there are many with national scopes as well as international. Not all have trade or government-related aspects, so there is a need for freedom in selecting the most appropriate standards that further their mission and purpose. ICE recognizes and appreciates that this flexibility has built into the proposed revisions and welcomes any opportunity to participate in discussion or in future work related to this topic.