

DEIJ Certification Assessment Report December 20, 2021

Nonprofit HR is the leading professional services firm focused exclusively on the talent and culture needs of the social impact sector.













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The Charge and Our Approach

With an overarching goal of ensuring a diverse genetic counseling workforce and increasing access to genetic counseling services, the American Board of Genetic Counseling (ABGC) initiated a review of its processes and procedures around certification examination development and administration. To ensure an unbiased process of assessment, ABGC identified Nonprofit HR to conduct an independent assessment of policies, practices, and stakeholder perspectives. The goal of the assessment was to determine if there are areas of improvement and considerations related to diversity, equity, inclusion, and justice (DEIJ) for people wishing to sit for the ABGC Certification Exam.

Nonprofit HR understands that the foundation of successful DEIJ interventions is knowing the current state of equity within a process or system – in this case, the ABGC Certification Process and Exam. This report is a comprehensive review of the considerations and information that Nonprofit HR reviewed to determine the current state of ABGC's DEIJ efforts and the state of the Certification Exam and Exam Administration practices.

DEIJ

Diversity, equity, inclusion, and justice are collectively used as a framework of considerations to assess a process or system to determine if it has the potential to have a disparate impact on certain populations.

For the purposes of this report, the primary areas of inquiry that were assessed with consideration to DEIJ include:

- Process Review of Certification Exam Development
- Process Review of Certification Exam Administration
- Environmental Scan of Regulatory Authorities and Professional Associations
- Survey of key stakeholders to identify perceptions of issues related to DEIJ
- Item Review of 607 Questions Currently Used in the Certification Exam
- National Commission for Certifying Agencies (NCCA) Standards Review

Findings

Findings are limited to high level summaries of the key focal areas of the DEIJ Assessment. Additional context and detailed findings (where included) are noted and attached as Appendices. Overall, Nonprofit HR has concluded that the current state of ABGC's Certification Exam and Corresponding Processes are in good shape where information is available, but that there are opportunities for further investigation and consideration to address potential DEIJ concerns.

• Process Review of Certification Exam Development. ABGC provided extensive documentation on the protocols in place for all aspects of Certification Exam Development. Existing protocols contain a variety of safeguards to ensure equitable design practices for the exam, including recruiting genetic counselors from a variety of practice areas to draft items; item writing training, which incorporates efforts to minimize bias in question design; a Certification Exam Committee to support extensive reviews and support for new item development; and a testing process for determining if new items should be added to the question bank for the exam.

An area of consideration related to exam development centers on the lack of demographically diverse genetic counselors to support item development. There are many studies on standardized tests across industries and within education that describe the phenomenon of cultural bias being unknowingly embedded into standardized instruments. To mitigate this, it is ideal to have a demographically diverse group of individuals supporting assessment item development. With the current data and testing protocols, it is not possible to conclude if cultural bias exists in the ABGC Certification Exam. However, stakeholder feedback directly described assessment content that would lead the average researcher to consider it a possibility, so this warrants additional reflection.

Another area of consideration for exam development is the length of the assessment. While the goal to capture the many practice areas of genetic counseling in a single instrument is admirable, it comes at the expense of the test taker. Responding to the 200 items may take up to 4 hours without interruption. An assessment of this length without breaks can cause mental fatigue and physical exhaustion for the test takers. If possible, a shorter assessment would improve the test taking experience and reduce the burden placed on test takers.

A final area of consideration for exam development is related to the test only being offered in English. While the majority of U.S. citizens speak English, this does put non-native English speakers at a disadvantage. Additionally, having the assessment in only one language does not support the development of bilingual Genetic Counselors, which could be a pathway to alleviate the need for interpreters during patient interaction.

Process Review of Certification Exam Administration. Stakeholder feedback yielded a number of
considerations for the current ABGC Certification Exam practices and processes and how they may
be problematic to some persons who aspire to obtain certification. An independent review of the
exam administration procedures surfaced one notable gap in awareness in the current process of

administration that could shed light on the possibility of disparate impact. *Disparate Impact* occurs when a decision, practice or policy has a disproportionate negative impact on a protected group, regardless of whether the impact was intentional.

ABGC's ability to pivot during the pandemic to offering remote proctored exams has been reported as a strength in support of DEIJ considerations. Many stakeholders identified proximity to test taking sites and stress of getting to testing sites as a significant barrier to participating in the certification process. Being able to do this remotely is one solution to the limited number of test sites nationally. An additional and related concern raised were the limited number of instances when the exam is offered. This presents a concern related to scheduling and navigating work or personal obligations to sit for the certification exam.

One of the most salient barriers to certification raised was the associated cost. Practice exams and sitting for the certification exam are the most common areas of opportunity noted by certificants and those who aspire to be certified. Persons who aspire to be Genetic Counselors may not always be in a position to pay to sit once or multiple times for the exam if they are attempting to be certified as a prerequisite for employment. Additionally, persons who need to recertify have varied financial circumstances that they may be navigating. Consider ways that this barrier might be mitigated through non-traditional means or funding sources.

One significant area of opportunity is the lack of demographic data collected as part of the certification process. The observation of a homogenous network of genetic counselors in the field who also support assessment development, coupled with stakeholder concerns of cultural bias in the assessment instrument, yield an opportunity to assess the outcomes of the certification exam to determine if disparate impact is present. Assessing disparate impact is a common practice in relation to employment and hiring outcomes, so it is a plausible consideration if a pre-employment qualification process such as a certification exam also creates barriers to persons of protected classes.

- The Environmental Scan of Regulatory Authorities and Professional Associations was conducted to compare the progression and status of work focused on DEIJ. Overall, ABGC is observed to be on par with these comparison organizations with respect to organizational DEIJ efforts. Many organizations are in the early phases of using DEIJ frameworks following the social unrest culminating in the year 2020, and it is anticipated that these organizations will continue to resource and integrate DEIJ considerations in their respective areas of focus. Detailed information of the regulatory scan can be found in Appendix A.
- Survey of key stakeholders to identify perceptions of issues related to DEIJ. A component of the assessment process included surveying individuals who have sat for the exam within the last five years regardless of outcome. This timeframe was limited to 5 years to ensure that stakeholder experiences are reflective of current Exam content and processes. Survey links were sent to 2,187 individuals with a response group of 346 (16%). Full survey results can be found in Appendix B. A few highlight results are:

- 346 respondents participated in the survey.
- o 97% of respondents believe it is important to improve DEIJ in the GC profession.
- 70% of respondents feel like they belong in the GC profession.
 - People who identified as White or Asian scored this higher than other groups.
- o 5% of respondents believe GCs are representative of the communities served.
- 67% of respondents reported that they have a strong understanding of how the ABGC Certification Process works.
- 38% of respondents believe the ABGC Certification Exam to be a fair tool to determine if someone is qualified to be a GC.
- Respondents provided a multitude of considerations related to the ABGC Certification Exam and Processes that warrant consideration from a DEIJ lens. Please refer to the qualitative data included on pages 37-39 in **Appendix B** to review recommendations and suggestions for improvement.
- Item Review: Two NPHR consultants reviewed a subset of items to ensure that independent item content reviews were completed with high reliability. Item content review rating was identical for 90% of the items in this subset, indicating high reliability in the item content review ratings. This indicates that the feedback provided is consistent across independent raters. Feedback on specific items is provided in a separate and secure document to ensure the confidentiality of the questions and the assessment process.

In summary, 9 items were identified as needing adjustment or removal based on DEIJ considerations. A total of 38 items were flagged for additional consideration and review by subject matter experts to ensure they are still relevant in practice today or with DEIJ centric notes for consideration. This latter group of items may still be acceptable for the assessment but should be discussed and debated by professionals in the field.

• National Commission for Certifying Agencies (NCCA) Standards Review. Nonprofit HR researchers reviewed ABGC documentation and compared the information to the NCCA Standards to both understand the operating environment they must navigate and assess level of adherence to the standards. A detailed documentation of this Standards review is included in Appendix C. It was determined that ABGC has met the standards with high fidelity. Focusing on areas of unclear or missing information, ABGC staff provided additional documentation or rationales after the initial review. This additional documentation added to the high fidelity already achieved by ABGC with the Standards with a few, minor areas still withstanding. Nonprofit HR researchers found the documentation well-organized and thorough which largely explains ABGC's accreditation status.

Recommendations

Based on all of the available information and applying best practices of DEIJ interventions, the ABGC Certification Exam Processes and Procedures have opportunity to be strengthened to ensure a diverse genetic counseling workforce and increase access to genetic counseling services. Recommendations for specific actions and considerations are described below.

- Certification Exam Development
 - When convening Item Writers to create new items, consider opportunities to recruit a demographically diverse team in addition to existing diversity considerations.
 - Consider additional words, phrases, and scenarios to avoid when writing questions in addition to ones included in item writing trainings.
 - o Investigate the feasibility of a shorter certification exam to reduce the test taking time.
 - Consider the need to translate tests to minimize failure due to lack of proficiency in English.
- Certification Exam Administration
 - Continue having remote proctoring as an option to mitigate instances of low proximity to test sites.
 - Consider the possibility to offer the exam more than twice a year to accommodate test retakers and personal differences related to navigating schedules.
 - Identify opportunities for scholarship or cost reduction/transference for persons who wish to sit for the exam.
 - Institute voluntary demographic collection as part of certification exam administration to allow for assessment of disparate impact.
- Environmental Scan of Regulatory Authorities and Professional Associations
 - Consider opportunities to partner with Regulatory Authorities and Professional Associations on complementary DEIJ work. The GC field relies on all of these organizations to be in alignment of key DEIJ concerns in the GC profession to ensure progress across the board.
- Survey of key stakeholders to identify perceptions of issues related to DEIJ
 - Consider the concerns and issues raised by the stakeholders and determine what areas might be within ABGC's influence to address.
 - *Note* recommendations in other areas may be based in part on the feedback included in this survey

- Item Review of 607 Questions Currently Used in the Certification Exam
 - Consider reviewing item banks to determine if oversampling of certain demographic groups exists.
 - Ensure a diversity of current and relevant demographic scenarios exist within the item bank. Consider demographic difference across areas including but not limited to: race/ethnicity, gender identity, couples and family structure, and any others that are used in the item bank scenarios.
 - Convene a diverse group of GC SMEs to review the individual item feedback provided by Nonprofit HR to work through necessary adjustments to the ABGC Certification Exam active item bank. Also have this group review other item banks to ensure alignment of new considerations.
- National Commission for Certifying Agencies (NCCA) Standards Review
 - Since ABGC is currently certified by NCCA Standards, no immediate action is required.
 However, specific considerations for individual Standards are offered in Appendix C should ABGC consider areas to strengthen in the future.

Appendix A: ABGC Environmental Scan: Regulatory Authorities and Professional Associations

Review completed on 8/25/21

Purpose

NPHR conducted an environmental scan of regulatory authorities and professional associations for ABGC. The purpose of the scan was to learn what comparable authorities and professional associations are doing or recommending for Diversity, Equity, Inclusion, and Justice (DEIJ) and the intersection of DEIJ with the "four E's" of certification: education, experience, examination, and ethics requirements of certification.

Method

The ABGC DEIJ project team identified four key regulatory authorities and professional associations to scan. The regulatory authorities and professional associations are:

- 1. Institute for Credentialing Excellence
- 2. National Commission for Certifying Agencies
- 3. National Society of Genetic Counseling
- 4. Accreditation Council for Genetic Counseling

The DEIJ scan was limited to readily available materials on the organizations' websites and documents posted on the websites. All webpages were scanned individually. In addition, NPHR searched for keywords by using the website search bar and in some individual documents. The scan was conducted during the period of August 12 through August 25, 2021.

Information Organization

Information for each entity is organized in the following order: the organization's website URL; the organization's description which is the "about" section from their website; the organization's mission; the organization's statement on DEIJ, if there is one; followed by an itemized list of findings including hyperlinks to the location of the information or document when logical and available with only the most relevant information outlined.

Further exploration

There are a number of additional resources, opportunities, and potential impacts to explore DEIJ in the four E's. Some areas of exploration are highlighted in this section and are labeled as "Questions for further consideration/investigation."

Institute for Credentialing Excellence (I.C.E.)

URL: https://www.credentialingexcellence.org/

About

"The Institute for Credentialing Excellence, or I.C.E., is a professional membership association that provides education, networking, and other resources for organizations and individuals who work in and serve the credentialing industry. I.C.E. 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."

Mission

"Mission: Lead through accreditation, advocacy, education, innovation, research, and standards to enhance the value of credentialing organizations. Vision: Excellence in credentialing provides a safe, effective and ethical workforce."

DEIJ Scan

There is minimal reference to DEIJ in the reviewed materials. However, there appears to be some strategic prioritization, an active DEI task force, and initiatives that are currently in development for improving DEI internally and externally. Potentially, there will be significant guidance in the future.

- 1. I.C.E. does not appear to have a **DEIJ statement**.
- 2. I.C.E.'s <u>Ethics Policy Statement</u> states under Respect and Dignity, item #3 that I.C.E. Organizational Members should: "Promote a culture of dignity, respect and inclusivity; appreciating and embracing diversity."
- 3. I.C.E. has a DEI Task Force charged with engaging "...membership in designing a DE&I Plan for ICE that resonates, is appropriate for the credentialing community, and focused internally as well as externally." One of I.C.E.'s 2021 priority projects is Diversity, Equity & Inclusion: "The DE&I Task Force will examine how I.C.E. can improve diversity within the organization internally as well as externally within the credentialing community. The group will examine data to determine resources the I.C.E. membership and organization need to succeed in this specific topic area."
- 4. Under <u>Career Competence</u>, I.C.E.'s Credentialing <u>Career Paths and Competency Matrix</u> identifies "Supports affirmative action and respects diversity" as a Competency Factor of Organization Support for three out of ten credentialing careers: Certification Administrator, Certification Coordinator, and Test Developer. This tool does not appear to address any competencies associated with DEI (e.g., cultural competency, implicit bias).
- 5. I.C.E. very recently adopted an End Statement that they believe will impact credentialing organizations. See *An Update From I.C.E.'s DEI Task Force* (published August 19, 2021),
 - a. 8.1. I.C.E. is a credible voice on DE&I practices and thought leadership in the credentialing community.
 - DE&I practices and behaviors are adopted as a driving force in the organization.
 - DE&I practices and behaviors are firmly in place to guide membership, leadership, staff and program/volunteer development.
- 6. The most direct "guidance" located is very recent (August 19, 2021) also from *An Update From I.C.E.'s DEI Task Force* (see item #5 above). I.C.E.'s task force is guiding organizations to take steps, including:

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- a. Completing I.C.E. surveys providing demographical information and other feedback
- b. Attending the I.C.E. Exchange **DE&I workshop**
- c. Participating in I.C.E. DE&I focus group discussions, and
- d. Reviewing your certifying board's DE&I policies and developing new strategies and policies, as necessary

National Commission for Certifying Agencies (NCCA)

URL: https://www.credentialingexcellence.org/

About

"...The NCCA Standards were developed to help ensure the health, welfare, and safety of the public. They highlight the essential elements of a high-quality program...NCCA accredited programs certify individuals in a wide range of professions and occupations including nurses, automotive professionals, respiratory therapists, counselors, emergency technicians, crane operators and more...Accreditation for professional or personnel certification programs provides impartial, third-party validation that your program has met recognized national and international credentialing industry standards for development, implementation, and maintenance of certification programs."

Mission

"The NCCA will be an administratively independent resource recognized as the authority on accreditation standards for professional certification programs. Based on sound principles, NCCA standards will be optimal and comprehensive criteria for organizational process and performance. They will be broadly recognized, objective, and current benchmarks for certifying bodies to achieve and by which they operate. The NCCA helps to ensure the health, welfare, and safety of the public through the accreditation of a variety of individual certification programs that assess professional competency. The NCCA uses a peer review process to: Establish accreditation standards; Evaluate compliance with these standards; Recognize programs that demonstrate compliance; Monitor and enforce continued compliance; and, Serve as a resource on quality certification."

DEIJ Scan

NCCA 2021 Revised Standards appear to address DEIJ at least minimally.

- 1. NCCA Standard 13: Panel Composition generally requires a panel of qualified SME's. "Representation" is a new addition to the <u>current standard compared to revised standard</u>. Essential Element A requires: "Each panel must represent the relevant characteristics of the population to be certified as the program defines them. The process of recruitment and involvement of SMEs must prevent the undue or disproportionate influence of any individual or group." However, the <u>SME Demographic & Activity Template</u>, which is probably based on the current standard (not the revised standards), provided to assist the aspiring organization organize evidence for Standard 13 appears to only provide the following as demographic distinctions:
 - a. Area(s) of SME Expertise [subcategories of specialization]
 - b. Geographic or other SME representation
 - c. Education or other SME qualifications
- 2. NCCA Standard 13: Panel Composition also requires documentation on how SMEs were recruited to participate in panels.
- 3. NCCA Standard 14: Job Analysis states "The certification program must have a study that defines and analyzes descriptions of job-related elements linked to the purpose of the credential." Specifically, in the commentary, commentary item 2 specifies that validation of job-related elements is usually done by "certificants and/or a representative sample of the population" for certification. Commentary for item 6 specifies "analysis of the demographic and professional characteristics of the survey respondents should validate that respondents are representative of the diversity of the population as defined by the program. Certification programs should identify any patterns in responses based on respondent characteristics that

differ substantially from the known characteristics of the population. They should also describe the methods used to mitigate the effects of such findings (e.g., weighting of results, **subgroup comparisons**)."

4. NCCA Standards 2021 Draft Revisions Standard 23: Maintaining Accreditation

Questions for further consideration/investigation:

- 1. There are not rigid guidelines for how a program defines the "diversity of the population."
- 2. At risk of reading "representative sample of the population" too literally, consider the rationale of what is included in the definition of "representative." Should "representative" be diverse and inclusive groups (e.g., race and gender)?
- 3. If other demographic information is not collected about SME's how can undue group or disproportionate group influence be determined?

National Society of Genetic Counselors

URL: https://www.nsgc.org/

About

"The National Society of Genetic Counselors (NSGC) promotes the professional interests of genetic counselors and provides a network for professional communications. Access to continuing education opportunities, professional resources, advocacy and the discussion of all issues relevant to human genetics and the genetic counseling profession are an integral part of belonging to the NSGC."

Mission

"The National Society of Genetic Counselors advances the various roles of genetic counselors in health care by fostering education, research, and public policy to ensure the availability of quality genetic services."

DEIJ Scan

NSGC has a significant amount of DEIJ material comparatively.

- 1. NSGC has a Statement of Justice, Equity, Diversity, and Inclusion (J.E.D.I.)
 - a. "A guiding principle of the National Society of Genetic Counselors (NSGC) is to integrate genetics and genomics to improve healthcare. As a society, we can only meet this goal by promoting the active participation and leadership of people with diverse identities, perspectives, and backgrounds. Starting within our organization and extending into the larger healthcare system, we seek to empower our members to advocate for themselves, each other, and the diverse people we strive to serve."
- 2. It appears NSGC began systematically committing organizationally to diversity and inclusion in their 2018 strategic plan. NSGC is prioritizing **Diversity and Inclusion** in the <u>NSGC Strategic Plan 2019-2021</u>. In Strategic Area of Focus 4: Diversity and Inclusion, "NSGC will promote a culture of inclusivity that **supports visible and invisible diversity** and leverage that culture to **expand the perspectives represented in our field**, build community and **foster equity in genetic services**."
 - Objective 1: Establish organizational structure to advance inclusion, diversity, community Action Step was to develop an inclusion and diversity statement by June 30, 2019. See JEDI statement above (Item #1)
 - b. Objective 2: Engage diverse communities Action Step was to "Assess barriers to recruitment of underrepresented groups into the genetic counseling profession and identify any opportunities for NSGC to reduce identified barriers by June 30, 2020."
- 3. NSGC posted their very recent <u>NSGC DEI Assessment</u>. The report in and of itself is of interest for the ABGC Environmental Scan; however, it is probably important to note here a potential source of racial and ethnic and gender data for at least one part of the counselor pipeline. Racial and ethnic data were provided from NSGC Professional Status Survey (PSS) trends data, which was self-reported by NSGC members, ABGC diplomates and CAGC members (in 2020) who completed the PSS (annual response rate of 50% or above). (NSGC DEI Assessment, pp. 31-33).
 - a. About 95% genetic counselors identified as female.
 - b. On average over five-year period (2016-2020):
 - About 92% of PSS Respondent's are White or Caucasian,
 - About 5% are Asian,
 - About 2% are Hispanic or Latino(a),

- About 1.5% are Middle Eastern
- About 1.4% are Black or African American
- 4. In 2019, NSGC formed the NSGC Diversity and Inclusion Task Force. NSGC is forming a J.E.D.I. Action Plan Task Force tasked with the task of developing NSGC's J.E.D.I. plan for a "more just, equitable, diverse, and inclusive organization." NSGC produced a <u>Summary report of the 2019 Diversity and Inclusion Task Force of the National Society of Genetic Counselors</u> (Journal of Genetic Counseling, Volume 29, Issue 2, pp. 192-201). Also see Full Task Force Recommendations to NSGC Board. Some Task Force recommendations of note:
 - a. **Genetic counseling as a profession has remained homogeneous** and also possibly the folks who have access to genetic counseling has remained homogeneous
 - b. "The need for an increasingly culturally competent and diverse genetic counseling workforce has long been recognized."
 - c. "Underrepresentation, inequity, and/or exclusion are experienced among both trained genetic counselors as well as those in training."
 - d. Strengths and weaknesses identified by the Task Force (Section 3.1 Charge 1)
 - Disparities in the genetic counseling profession due to lack of representation, historical inequities, and demographic homogeneity of the profession were considered to be weaknesses within the profession.
 - Empathy, adaptability, and problem-solving skills were recognized as strengths of the genetic counseling profession.
 - Cost, lack of inclusion, and lack of active allyship can lead to an echo-chamber of ideas
 within the NSGC leadership and membership, further contributing to the marginalization of
 members of underrepresented groups.
 - NSGC is well-equipped to disseminate information and act as a unifying voice for the genetic counseling profession.
 - There remains a need to challenge the implicit and explicit biases that exist within genetic counselors and the profession as a whole.
 - With the lack of equal representation, the burden falls disproportionately on underrepresented groups to challenge the disparities within the profession.
 - e. Some improvement opportunities identified by the Task Force (Section 3.2 Charge 2)
 - Increased accountability and metrics to inform and track DEI efforts and outcomes are needed in the genetic counseling profession.
 - Increased recruitment of diverse workforce, diverse leadership
 - Ongoing cultural competency training
 - Increased disability access
 - Active alliance across the profession
 - f. Essential concepts in developing the DEI Statement (Section 3.3. Charge 3)
 - Acknowledge historic inequities in the genetics community and how it may contribute to disparities within the profession
 - Define underrepresented
 - Leverage the profession's strengths to increase inclusion and diversity
 - g. Recommendations for diversity and inclusion efforts for NSGC Leadership Awards program (Section 3.4 Charge 4)

- Acknowledge genetic counselors and volunteers who promote DEI ("Leader in Diversity and Inclusion Award" and "Leader in Cultural Advocacy Award")
- Gender-binary pronouns removed or changed to gender-neutral pronouns in award descriptions
- Shift focus to individuals exploring or elevating "person-focused experiences across race, ethnicity, gender identity, sexual orientation, and/or spoken/understood language"
- h. Diversity and inclusion oversight and direction setting (Section 3.5 Charge 5)
 - Hiring a **DEI consultant** to guide best practices for improving DEI in the profession, assess, and craft a DEI plan
 - DEI Advisory Committee of diverse voices with clear scope of expectations, training, and resources
- i. Section 3.6 Charge 6
 - Organization-wide Universal Design plan to evaluate and ensure spaces (real and virtual)
 and information is accessible to all people
 - Cultural Competency Subcommittee scope to focus on cultural competence curriculum only
 - Explore career pipeline barriers and possible solutions, including:
 - Lack of awareness of profession among underrepresented groups
 - Financial obstacles
 - Webpage devoted to DEI on NSGC website
 - Transparency
 - Provide updates, metrics and resources for membership
- DEI focus areas (long term goals) (Section 3.7 Charge 7)
 - Reporting DEI Progress, Outcomes, and Available Resources
 - Demographic Representation
 - "The TF recognizes the need for equitable demographic representation at all levels within the genetic counseling profession, including the prospective student pipeline as well as within the NSGC membership and leadership. Diverse representation is necessary to create conditions that minimize implicit bias"
 - Increase awareness, access, entry, and retention of diverse people into the profession
 - Accessible NSGC Resources
 - Best Practice and Evidence-based Interventions
 - Research activities to develop a better understanding of DEI issues in genetic counseling community
 - Ongoing Education
 - Continue developing DEI educational resources
 - Integrating DEI into Routine Activities
 - Integrate DEI principles into policies and systems that affect routine activities of genetic counselors
- k. NSGC created a <u>DEI Planning worksheet</u> using the DEI focus areas above. NSGC recommends using it as a "conceptual framework to guide project planning or modification."

- Dialogue with Stakeholders: "Who are all the people who would be affected by the outcome of this activity?; Are all stakeholders involved in the planning process? If not possible, how will their values and interests be represented?; Has explicit effort been made to elicit feedback from underrepresented perspectives to guide design of this activity?
- Transparent Reporting of DEI Progress and Outcomes: "What metrics and benchmarks are available to measure DEI for this activity? What additional metrics and benchmarks should be collected or developed? How will information about the current state and any progress be reported to relevant stakeholders?"
- Demographic Representation: "How does demographic representation in this activity compare to population census data? What steps can be taken to ensure active recruitment and/or representation of individuals with underrepresented characteristics and identities? What steps can be taken to promote continued participation of these individuals?"
- Accessible Resources: "Is this activity accessible to people of varying identities, spoken languages, abilities and disabilities? What steps can be taken to ensure that it is accessible to as many types of people as possible using the principles of Universal Design?"
- Evidence-based and Established Best Practices: "What is the scientific evidence base for promoting DEI for this type of activity? If there is no available scientific evidence, what are the established best practices? If there are not available established best practices, what steps are needed to obtain feedback from stakeholders?"
- Ongoing Education: "What steps can I / my team take to become better educated about the DEI evidence base or best practices that apply to this activity? What education and resources are already available through my professional organization? How can I provide feedback to the organization about additional needs?"
- Integrating DEI throughout the activity: "Does the plan to promote DEI for this activity integrate throughout the activity or is it just a component that could be set aside without impacting the outcome? What steps can be taken to ensure that respect and support for people of diverse characteristics and identities is present throughout design and implementation?"
- 5. NSGC produced the <u>Genetic Counseling Cultural Competence Toolkit Cases</u> which is an independent study online course with three objectives:
 - a. "Identify resources for increasing their cultural knowledge.
 - b. Know how to apply cultural assessment tools in genetic counseling practice.
 - c. Engage in cultural self-awareness, resulting in increased recognition of **personal biases**, limitations, and strengths when working with **culturally diverse clients**."
- 6. <u>NSGC Resources curated by the J.E.D.I. Committee</u>: Unable to review all the resources provided here in time allotted for scan.
 - a. Links to potentially pertinent Journal of Genetic Counseling Special Issue, <u>Volume 29, Issue 2, Special Issue: Minority and Health Disparities in Research and Practice in Genetic Counseling and Genomic Medicine</u>
 - b. This page also linked to additional groups. For example, the <u>Genetic Counseling Trainee Platform for Racial Justice</u> resources which included more resources. Did not scan because this was not in scope and limited time but there appeared to be potential resources of note here as well.

7. NSGC also has a <u>NSGC YouTube channel</u>. Unable to review all the resources provided here in time allotted for scan.

Questions for further consideration/investigation:

1. Is it possible to access NSGC's report on barriers to recruitment of underrepresented groups in the genetic counseling profession to assess relevant information for certification practices and processes?

Accreditation Council for Genetic Counseling (ACGC)

URL: https://www.gceducation.org/

About

"Accreditation Council for Genetic Counseling (ACGC) is the accreditation board for graduate programs in genetic counseling. ACGC advances quality in genetic counseling education by developing and maintaining standards for educational and clinical training of genetic counseling students and implementing a peer-review process to evaluate programs."

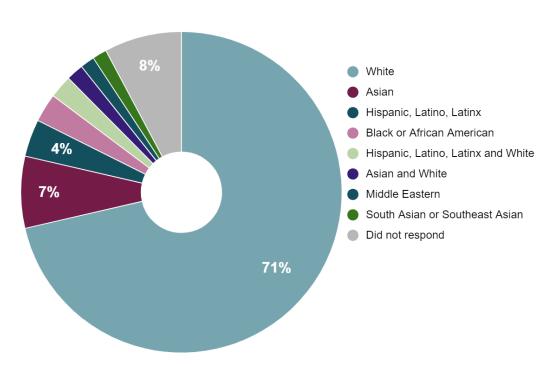
DEIJ Scan

- An ACGC <u>Diversity Taskforce</u> convened on July 1, 2019. Their work is not on the parent webpage and no other reference to Taskforce exists on pages in main menu or when using the search box. The taskforce is mentioned in the <u>Annual Report July 1, 2019 June 30, 2020</u>. The taskforce is responsible for guidance "regarding adequacy of current Standards pertaining to diversity, equity and inclusion as administered in graduate educational initiatives and the pathway of entry to the profession through graduate school." (Annual Report, p. 11)
- ACGC Revised Standards of Accreditation effective October 1, 2019. Section A 3.2.2 Admissions (Revised Standards, p.16)
 - a. "The ACGC supports increasing diversity in the genetic counseling profession. Programs are expected to develop strategies to promote applications from underrepresented populations and to summarize their efforts and progress in the accreditation application. Examples of possible strategies include the following:
 - The program establishes annual recruitment goals for underrepresented populations;
 - The program identifies new student scholarship opportunities for underrepresented populations;
 - The program documents activities and attendance by underrepresented candidates at local, regional and national outreach events; and
 - The program adds one or more individuals to the admissions committee from local community groups serving underrepresented populations."

Appendix B: Survey of Genetic Counselors and persons who have sat for the ABGC Certification Exam

Demographic Analysis of 346 Survey Respondents

Race / Ethnicity



"White" includes (2) White and Ashkenazi / Jewish, (1) Native Hawaiian or Pacific Islander and White, and (1) Native/Indigenous or Alaskan Native and White, and (1) Eastern European

"Asian and White" includes (1) Asian and Native Hawaiian or Pacific Islander and White; (1) Asian and Southeast Asian and White; (4) Asian and Southeast Asian and White

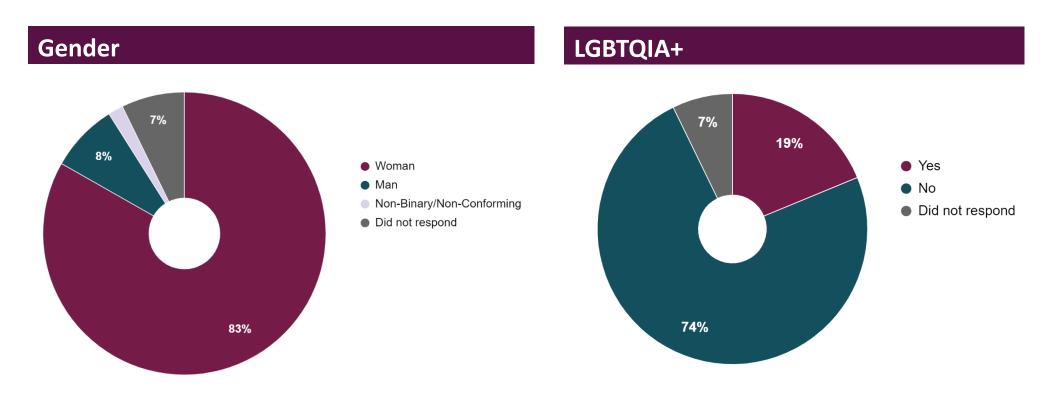
"Black or African American" includes (1) Black or African American and White

"Hispanic, Latino, Latinx and White" includes (1) Hispanic, Latino, Latinx and Black or African American and White

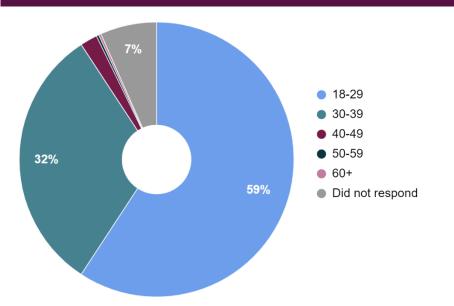
"Hispanic, Latino, Latinx" includes (1) Hispanic, Latino, Latinx and Asian

"Middle Eastern" includes (2) Middle Eastern and White and (1) Middle Eastern and White and Asian

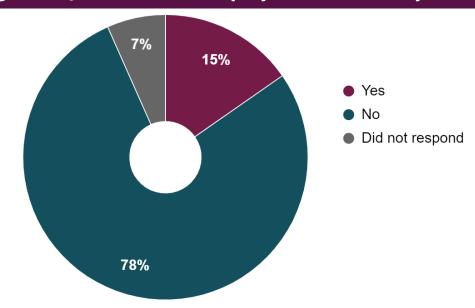
"South Asian or Southeast Asian" includes (2) South Asian, (1) Southeast Asian, and (2) Southeast Asian and White



Age Group

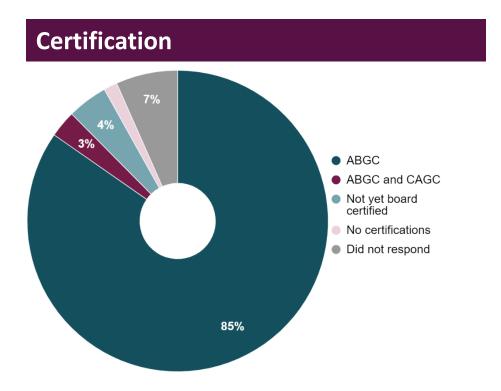


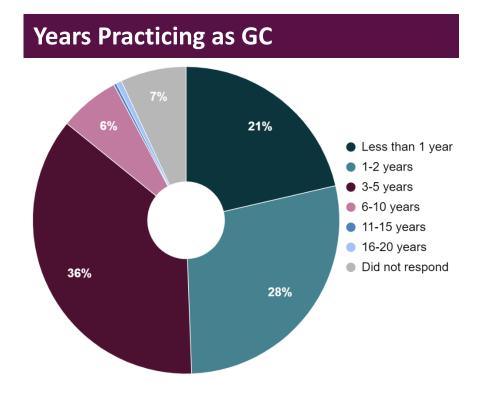
Cognitive/emotional or physical disability



Veteran or active military

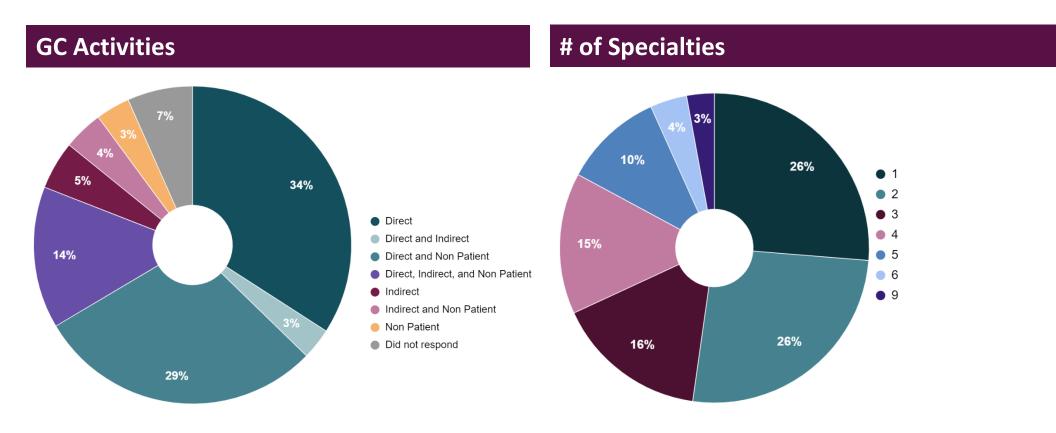
1 respondent identified as a veteran or active military member



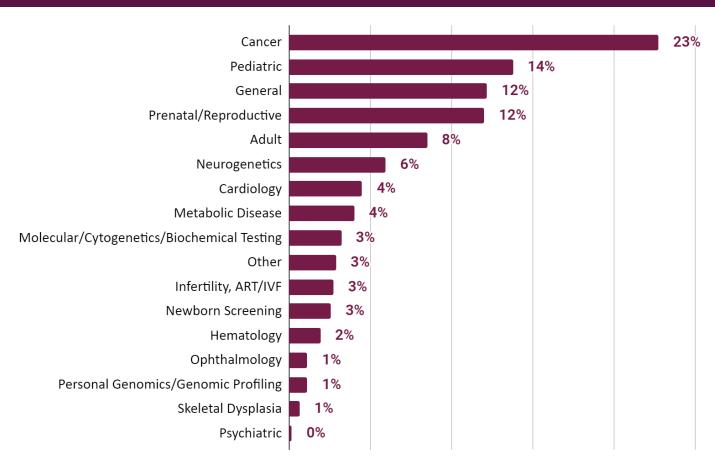


ABGC exam w/in last 5 years

95% of respondents have sat for the ABGC Certification Exam within the last 5 years.



Specialties*



^{*}Respondents counted for *each* specialty identified. 624 specialties identified by 346 survey respondents. 74% of respondents identified more than one specialty.

OPPORTUNITY SCALE

In good shape

Emerging strength

For consideration

Needs attention

Items 85% and above are typically viewed as strengths.

Items between 76% and 84% are a mix of emerging strengths and areas to be aware of.

Items between 50% and 75% indicate areas of opportunity.

Items below 50% indicate areas needing attention.

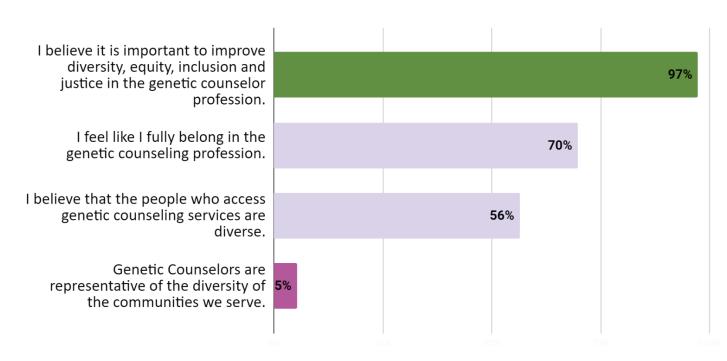
DEIJ in the Genetic Counseling Profession

In good shape

Emerging strength

For consideration

Needs attention



In good shape:

Large majority of respondents believe it is important to improve DEIJ in GC profession.

For consideration:

Only a little more than half of respondents belief people who access genetic counseling services are diverse. Needs attention:

Only 5% of respondents believe GCs are representatively diverse.

DEIJ in the Genetic Counseling Profession

In good Emerging For Needs strength consideration

	ALL	Race							Age Group			Gender			LGBT	QIA+	Disabilit		
	:: ALL	Asian	Asian and White	Black or African American	~	Hispanic, Latino, Latinx and White	Middle Eastern	South Asian or Southeast Asian	White	18-29	30-39	40 or above	Woman	Man	Non-Binary/ Non-Conforming	LGBTQIA+	No	Disability	No
I believe it is important to improve diversity, equity, inclusion and justice in the genetic counselor profession.	97%	96%	100%	100%	100%	75%	100%	100%	98%	98%	96%	89%	98%	93%	100%	98%	97%	100%	97%
I feel like I fully belong in the genetic counseling profession.	70%	48%	83%	40%	46%	63%	20%	40%	77%	74%	61%	78%	72%	48%	83%	46%	76%	51%	73%
I believe that the people who access genetic counseling services are diverse.	56%	44%	50%	40%	15%	50%	60%	60%	60%	56%	61%	22%	56%	56%	67%	63%	55%	62%	55%
Genetic Counselors are representative of the diversity of the communities we serve.	5%	0%	0%	10%	8%	13%	0%	0%	6%	5%	6%	0%	5%	11%	0%	2%	6%	2%	6%

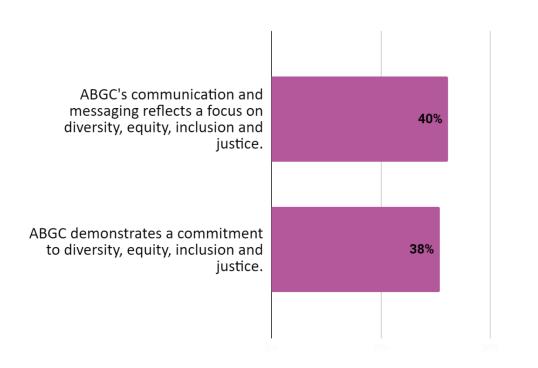
DEIJ in the Genetic Counseling profession

In good Emerging For Needs shape strength consideration

	ALL		Certif	ication			ars pra				Ger	etic Co	unselo	r Activ	ities	
	ALL	ABGC	ABGC and CAGC	Not yet board certified	No certifications	Less than 1 year	1-2 years	3-5 years	6-20 years	Direct	Direct and Indirect	Direct and Non Patient	Direct, Indirect, and Non Patient	Indirect	Indirect and Non Patient	Non Patient
I believe it is important to improve diversity, equity, inclusion and justice in the genetic counselor profession.	97%	97%	100%	100%	100%	100%	98%	96%	92%	96%	100%	98%	100%	94%	93%	100%
I feel like I fully belong in the genetic counseling profession.	70%	71%	100%	40%	20%	68%	70%	70%	76%	76%	64%	74%	62%	47%	57%	50%
I believe that the people who access genetic counseling services are diverse.	56%	57%	70%	33%	60%	53%	54%	60%	60%	63%	55%	56%	50%	29%	64%	50%
Genetic Counselors are representative of the diversity of the communities we serve.	5%	5%	0%	0%	20%	3%	7%	5%	8%	5%	0%	6%	6%	6%	7%	0%

DEIJ in ABGC

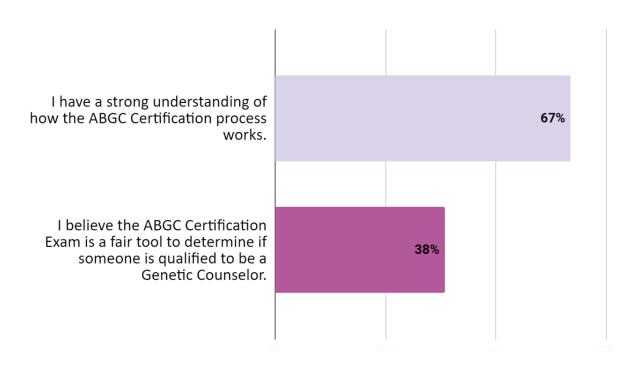




Needs attention:

Only about one-third of respondents believe ABGC demonstrates a commitment to DEIJ. This is consistently low across all respondent groups.
Less than half of respondents believe ABGC's communication and messaging reflects a focus on DEIJ. This is consistently low across all respondent groups.

In good Emerging For Needs shape strength consideration attention



Needs attention:

Only about one-third of respondents believe the ABGC Exam is a fair tool.

For consideration:

Only about two-thirds of respondents have a strong understanding of how the ABGC Certification process works.

In good Emergii shape strengt		Needs attention
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	ALL	Race								Age Group			Gender			LGBT	QIA+	Disa	bility
	:: ALL	Asian	Asian and White	Black or African American	Hispanic, Latino, Latinx	Hispanic, Latino, Latinx and White	Middle Eastern	South Asian or Southeast Asian	White	18-29	30-39	40 or above	Woman	Man	Non-Binary/ Non-Conforming	LGBTQIA+	No	Disability	No
I have a strong understanding of how the ABGC Certification process works.	67%	56%	50%	40%	77%	50%	40%	80%	69%	62%	72%	78%	66%	70%	67%	65%	66%	66%	66%
I believe the ABGC Certification Exam is a fair tool to determine if someone is qualified to be a Genetic Counselor.	38%	24%	33%	20%	23%	13%	20%	40%	43%	36%	44%	33%	38%	41%	50%	23%	43%	30%	40%

For consideration:

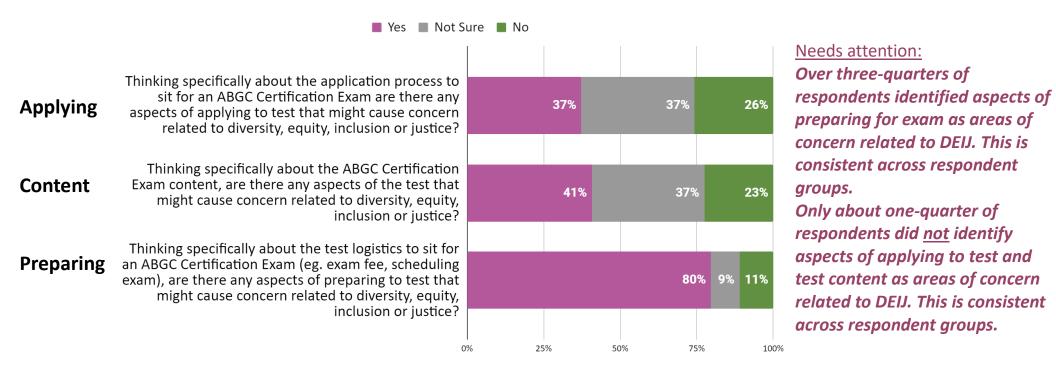
Mixed results for understanding of how ABGC Certification process works. Less than half (40%) Black or African American and Middle Eastern (40%) respondents agreed they have strong understanding of how ABGC Certification process works.

Needs attention:

A little more than one-third (38%) of respondents believe ABGC's communication and messaging reflects a focus on DEIJ. This is consistently low across all respondent groups while "Hispanic, Latino, Latinx and White" is lowest (13%).

In good Emerging For Needs strength consideration

	ALL		Certifi	cation			•	cticing Counse		Genetic Counselor Activities								
	ALL	ABGC	ABGC and CAGC	Not yet board certified	No certifications	Less than 1 year	1-2 years	3-5 years	6-20 years	Direct	Direct and Indirect	Direct and Non Patient	Direct, Indirect, and Non Patient	Indirect	Indirect and Non Patient	Non Patient		
I have a strong understanding of how the ABGC Certification process works.	67%	66%	80%	47%	100%	61%	63%	70%	76%	68%	45%	63%	70%	53%	79%	75%		
I believe the ABGC Certification Exam is a fair tool to determine if someone is qualified to be a Genetic Counselor.	38%	39%	70%	13%	0%	32%	33%	45%	44%	40%	27%	37%	40%	24%	50%	50%		



Note, reporting in stacked bar chart because "Not Sure" (neutral) was large for these items.

ABGC Certification Exam preparation & application process: DEIJ concerns

DEIJ concerns *identified by respondents* in order of *frequency*:

- Cost. Note, cost was identified as a barrier at a significantly high frequency.
- Number and distance to testing center locations. Respondents stated some locations are so far away it requires
 overnight travel which is an additional stress and expense, additional time off work, and time away from family. This is
 in addition to the barrier of access to transportation to get to site.
- Time of year and limited number of exams (two) per year. Respondents believe offering the exam twice a year is a barrier for many, including folks that have to wait six months to retake the exam for failing or rescheduling for other reasons.
- Day of week and time of day offered. Many stated times offered were during work days only and that it was a barrier
 due to having to take off work to prepare for and sit for exam.
- Prep materials and supports were limited and expensive. It was not clear what to study. Some implied materials were
 outdated and access to materials was dependent on program.
- Application process, scheduling and rescheduling confusing and/or time consuming. Respondents also stated a number
 of times it was difficult to impossible to get assistance.
- Accommodations. Respondents stated it was extremely difficult to get accommodations and that accommodations
 were not always honored by testing sites.
- English language only. Respondents implied it was not possible to get accommodations (e.g. extended time, alternative language) for non-native English speakers.
- Long sitting time. Respondents believe four hours of sitting without bio, food, or stretch breaks is a barrier especially for those who have disabilities. Respondents also mentioned it was difficult to get accommodations for this (see above).

ABGC Certification Exam **content**: DEIJ concerns

DEIJ concerns *identified by respondents* in order of *frequency*:

- Bias toward Eurocentric, English speaking, white, females. Respondents believed the questions are written assuming GC is white, English speaking, female. This requires test taker to respond not as self but as white, female, English speaking to arrive at best answer.
- Questions include stereotypes. Respondents also believed some of the stereotypes were offensive and/or made them feel
 uncomfortable.
- Questions are outdated. Respondents believe the scenarios or best answers are not reflective of actual, current GC practices.
- Questions lack diverse representation and simultaneously questions included race when it is not necessary. Respondents thought if including race, be as diverse, non-stereotypical as possible or don't include race at all.
- No questions explicitly related to **Justice**, **Equity**, **Diversity and Inclusion**.
- Exam is English language only.
- Gender pronouns exclude non-binary and transgender individuals.
- Only certain specialties are represented in exam. Only one specific mention of "skewed toward prenatal and pediatric."
- Other:

Assuming **partnerships** are between a man and woman.

LGBT is not represented.

What **new steps** could ABGC take to ensure that the certification process is diverse, equitable, inclusive and just?

Recommendations *identified by respondents* in order of *frequency*:

- Reduce cost burden. Some ideas include a sliding scale, subsidies and/or scholarships, include cost of exam in program cost, payment plans, etc.
- Review and revise exam content for bias and stereotypes.
- Revise to increase diverse representation.
- Update exam content to represent current GC practices.
- Consider changing to or providing alternative formats other than sit down multiple choice exam. Some ideas include portfolios and reviewing current certification practice in other disciplines.
- Keep test from home option as well as increase the number of test centers and/or reducing distance.
- Enlist and include diverse representation and voices on the board and in the exam review and revision process. Representation from different race, gender, and backgrounds as well as specialties.
- Improve the application process, scheduling process, rescheduling process, and cancellation policies. Recommendations include streamlining and ensuring there is support by phone in addition to email.
- Increase the number of exams given per year.
- Make applying for accommodations easier and ensure accommodations are provided at test sites. Recommendations include making what accommodations are available and how to apply clearer and upfront, as well as less burdensome to prove.
- Make test prep and support free, available, current
- Improve process for non-native English speakers and non-U.S. GCs.
- Allow break during sitting for exam.
- Allow more attempts.
- Track demographics of examinees.

Appendix C: National Commission for Certifying Agencies (NCCA) Standards Review

The purpose of this task was to evaluate ABGC's adherence to the National Commission for Certifying Agencies (NCCA) Standards for the Accreditation of Certification Programs (hereafter referred to as the "Standards"). Nonprofit HR researchers reviewed the documents provided by ABGC as well as the ABGC.net website. We assessed adherence at the Essential Element level within each of the 24 standards. To provide ABGC with a simple tool for feedback, we utilized a rating scale from 1 to 5 with 1 meaning no evidence of the Standard was found and 5 indicating the documentation covered the entire Essential Element of the Standard. See Table 1 for the rating scale.

Table 1. Rating Scale for Standards Adherence Review

1	2	3	4	5
No evidence of the	Little evidence of the	Some evidence of the	Evidence in the	Evidence in the
Essential Element of the	Essential Element of the	Essential Element of the	documents/interview mostly	documents fully covers
Standard found in the	Standard found in the	Standard found in the	covers the Essential Element	all aspects of the
documents.	documents; less than half	documents;	of the Standard; more than	Essential Element of the
	of the Standard covered	approximately half of the	half of the Standard covered	Standard.
	in the documents and/or	Standard covered in the	in the documents, including	
	evidence of key aspects	documents, including	key aspects of the Standard.	
	of the Standard could not	some key aspects of the		
	be found.	Standard.		

Table 2 contains the Standard name, general text, Essential Element text, document or source reviewed for adherence, and rating. We hope the mapping between the Essential Element and document/source is helpful in addressing some ratings that are less than 5. Some Essential Elements were deemed not applicable (N/A) and were therefore not rated. We also provided some qualitative feedback to some ratings to explain the rating or provide additional context.

Overall, NPHR researchers found the ABGC documentation to address almost every aspect of the Standards with high fidelity. ABGC staff provided documentation or rationales after the initial review by NPHR researchers that helped complete the review. NPHR researchers found the documentation well-organized and thorough which largely explains ABGC's accreditation status.

Table 2. Standard Text and Document/Source Mapping and Rating

Standard Text	Document or Source Reviewed	Rating
The purpose of the certification program must be to		
recognize each individual who meets established criteria.		
These criteria must uphold standards for practice in a		
profession, occupation, role, or specialty area.		

https://www.abga.not/bacaming.cortified/	
https://www.abgc.net/becoming-certified/ https://www.abgc.net/becoming-certified/do-i-qualify/	5
https://www.abgc.net/about-abgc/mission-history/ https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook- April-2021_WEB-final.pdf	5
	https://www.abgc.net/about-abgc/mission-history/ https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook-

Standard 2: Governance and Autonomy		
The certification program must be structured and governed in ways that are appropriate and effective for the profession, occupation, role, or specialty area; that ensure stakeholder representation; and that ensure autonomy in decision-making over all essential certification activities.	https://www.abgc.net/about-abgc/board-elections-things-to-know/	
Essential Elements: A. The certification program must have established policies and procedures showing that the governance structure and the process for selection and removal of certification board members protects against undue influence that could compromise the integrity of the certification process.	https://www.abgc.net/about-abgc/board-elections-things-to-know/https://www.abgc.net/about-abgc/role-of-the-board-in-genetic-counseling/https://www.abgc.net/getattachment/About-ABGC/Mission-History/ABGC-Bylaws-approved-8-2019.pdf.aspx/?lang=en-US	5
B. The certification organization must identify its status as a legal entity (or part of a legal entity) and demonstrate that the certification board has autonomy in decision-making for all essential certification policies and activities.	https://www.abgc.net/about-abgc/ https://www.abgc.net/getattachment/About-ABGC/Mission-History/ABGC-Bylaws-approved-8-2019.pdf.aspx/?lang=en-US	5
C. The composition of the certification board must include individuals from the certified population and may include other appropriate stakeholder groups. The certification program must identify its stakeholders and provide an ongoing mechanism to solicit their input.	https://www.abgc.net/getattachment/About-ABGC/Mission- History/ABGC-Bylaws-approved-8-2019.pdf.aspx/?lang=en-US https://www.abgc.net/about-abgc/2020-annual-business-meeting/ https://www.abgc.net/about-abgc/contact/	5
D. The certification board must include at least one member, with voting rights, that represents the public or non-employer consumer interest. The certification program must document how the public interest is routinely represented and protected.	https://www.abgc.net/getattachment/About-ABGC/Mission-History/ABGC-Bylaws-approved-8-2019.pdf.aspx/?lang=en-US (ARTICLE IV. BOARD OF DIRECTORS Section 1. Composition of the Board)	5
E. The certification program must demonstrate that members of the certification board do not have a conflict of interest in their overall capacity to serve that could compromise the integrity of the certification program. Feedback:	01_ABGC CEC Manual revised 2021_FINAL (1).docx https://www.abgc.net/getattachment/For-DiplomatEs/Practice- standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US	5

Appropriate separation must exist between certification		
and any education or training functions to avoid conflicts		
of interest and to protect the integrity of the certification		
program.		
Essential Elements:	01_ABGC CEC Manual revised 2021_FINAL (1).docx	5
A. Clearly delineated policies and procedures, with		
defined roles and responsibilities, must demonstrate that		
all functions performed by the certification board, its		
certification staff, certification committee members, and		
all subject-matter experts (SMEs) are impartial related to		
education/training leading to initial certification.		
B. If the certification organization or a related entity offers	https://www.abgc.net/becoming-certified/exam-preparation-	5
examination review courses or materials to prepare for	materials/	
the certification examination, or education/training that	https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook-	
meets the eligibility requirements, it must meet the	April-2021_WEB-final.pdf	
following requirements:	https://store.lxr.com/dept.aspx?id=128	
 The organization or related entity must not state or 		
imply that the examination review courses and/or		
preparatory materials are the best or only means for		
preparing adequately for the certification examination;		
 There must be no advantage given to candidates who 		
participate in examination review courses or		
education/training that meets the eligibility requirements;		
The purchase of these courses and materials must be		
optional; and		
• The certification organization or related entity must not		
state or imply that its education or training programs are		
the only or preferred route to certification.		

Standard 4: Financial Resources		
The certification organization must have sufficient		
financial resources to conduct ongoing, effective and		
sustainable certification and recertification activities.		
Essential Elements:	https://www.abgc.net/about-abgc/2020-annual-business-meeting/	5
A. The certification program's financial reports must	ABGC Strategic Plan Dashboard_as of_7-12-2021.xlsx	
demonstrate adequate resources available to support		
ongoing certification and recertification activities.		
B. For programs that are not independently financially	N/A	
viable and are supported by another entity, written		
agreements with that entity and documentation of		
financial viability of that supporting entity must be		
included with the application.		
Feedback:		

Standard 5: Human Resources		
Essential Elements: A. The certification program must identify primary personnel responsible for conducting certification activities (e.g., staff, consultants, psychometricians, vendors) along with their roles and qualifications for those	01_ABGC CEC Manual revised 2021_FINAL (1).docx	5
certification activities. B. The certification program must demonstrate appropriate oversight and monitoring of those personnel performing certification activities.	01_ABGC CEC Manual revised 2021_FINAL (1).docx	5
Feedback:		

 $\ensuremath{^{*}}\xspace$ Although both sources have a different form to complete and send address.

Standard 6: Information for Candidates		
The certification program must publish certification		
information that concerns existing and prospective		
certificants.		
Essential Elements:	https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook-	5
The certification program must make the following	April-2021_WEB-final.pdf	
information publicly available:	https://www.abgc.net/becoming-certified/do-i-qualify/	
A. Materials outlining all processes and procedures	https://www.abgc.net/becoming-certified/certification-process/	
regarding application and eligibility;	https://www.abgc.net/becoming-certified/august-2021-	
	certification-exam-cycle/	
B. A description of the examination used to make	https://www.abgc.net/ABGC/media/Documents/ABGC-Exam-Specs-	5
certification decisions;	PUBLIC-effective-08-01-2018.pdf	
C. Descriptions of examination processes, including all	https://www.abgc.net/becoming-certified/august-2021-	5
modes of examination delivery and the circumstances in	certification-exam-cycle/	
which they are offered to potential candidates;		
D. Procedures for candidates requesting a testing	https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook-	5*
accommodation;	April-2021_WEB-final.pdf	
	https://candidate.psiexams.com/bulletin/display_bulletin.jsp?ro=yes	
	&actionname=83&bulletinid=391&bulletinurl=.pdf	
E. A nondiscrimination and fairness policy;	https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook-	5
. ,	April-2021_WEB-final.pdf	
F. A policy for retesting of failing candidates;	https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook-	5
	April-2021_WEB-final.pdf	
G. Policies related to reconsideration of adverse	https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook-	5
certification decisions; and	April-2021_WEB-final.pdf	
H. Annual reports of the total number of candidates	ABGC CGC CGCAB21A TAR FINAL.pdf	5
examined, pass/fail statistics, and the number of	https://www.abgc.net/for-diplomates/case-simulations/	
individuals currently certified for each program.	https://www.abgc.net/about-abgc/2020-annual-business-meeting/	
	https://www.abgc.net/about-abgc/mission-history/	
Feedback:		

Standard 7: Program Policies		
The certification program must establish, enforce, and periodically review certification policies and procedures related to certification and challenges to certification decisions.		
Essential Elements: A. A certification program must enforce and periodically review policies and procedures for determining an applicant, candidate, or certificant's compliance with established certification requirements.	https://www.abgc.net/getattachment/About-ABGC/Mission- History/ABGC-Bylaws-approved-8-2019.pdf.aspx/?lang=en-US	4*
B. In establishing the eligibility requirements for taking the certification examination, the certification board must provide a rationale, either qualitative and/or quantitative, for all eligibility requirements.	https://www.abgc.net/becoming-certified/certification-exam-faqs/	5
C. The certification program must not unreasonably limit access to certification.		5**
D. The rationale for the retesting policy for candidates who have failed the examination must be provided.	https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook- April-2021_WEB-final.pdf	3***
E. The process for reviewing requests for accommodation must follow all applicable jurisdictional laws and regulations.	https://candidate.psiexams.com/bulletin/display_bulletin.jsp?ro=yes &actionname=83&bulletinid=391&bulletinurl=.pdf	5
F. Information must be available to interested parties for all requirements to obtain and maintain certification. The process to request reconsideration of an adverse decision must be made available to applicants, candidates, and certificants affected by the decision.	https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook- April-2021_WEB-final.pdf	5

- *There does not seem to be a process to "periodically review policies" but it is clear in the bylaws that the Board of Directors has the power to change these rules.
- **This was difficult to rate as it was a judgement call, but the application requirements are reasonable, and you offer both in-center and remote proctoring through PSI.
- ***Maintaining Active Candidate status is addressed in current documentation but it could be made clearer what occurs for retesting after an examinee fails the exam. Do they simply register for the next date? Is there a policy for when they fail multiple times?

Standard 8: Awarding of Certification		
The certification program must award certification only		
after the knowledge and/or skill of the individual		
candidate has been evaluated and determined to be		
acceptable.		
Essential Elements:	https://www.abgc.net/about-abgc/detailed-history.aspx/	5*
A. If any current certificants were granted certification		
without having to meet the examination requirements		
established for certification, a rationale must be provided		
to explain how the knowledge and/or skill of those		
individuals was evaluated and found sufficient. Any		
procedure for granting a credential in the absence of		
evaluating the knowledge and/or skill of an individual by a		
program's examination is not permitted once the program		
has applied for accreditation.		
B. Once a program has been accredited, it may grant	N/A	
reciprocal certification to individuals who hold a similar		
certification only if the program can demonstrate content		
and empirical equivalence between its examination and		
the examination of the other program. It must also		
provide evidence of comparability between its		
certification and recertification requirements and the		
other program's requirements.		
C. If a certifying body issues a trademark, service mark, or	https://www.abgc.net/ABGC/media/Documents/ABGC-Terms-and-	5
certification mark ("mark") to recognize achievement of a	Conditions-of-Use.pdf	
particular credential, the certifying body must have in		
place policies to ensure appropriate use of any such mark.		
Feedhack:		

^{*} The cited source does not directly address past certificants. Are these individuals "grandfathered" or are they also required to maintain certification every 5 years?

Standard 9: Records Retention and Management Poli		
The certification program must have a records		
management and retention policy for all certification		
related records.		
Essential Elements:	https://www.abgc.net/getattachment/For-DiplomatEs/Practice-	5
A. Programs must maintain records of applicants,	standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US	
candidates, current certificants, and previous certificants	https://www.abgc.net/about-genetic-counseling/find-a-certified-	
for the period of time appropriate for the legal	counselor.aspx/	
environment applicable to the certifying program. At a		
minimum, programs must verify the names of current		
certificants and certificate numbers (if applicable) as		
requested.		
B. The policy must indicate the length of time records are	https://www.abgc.net/getattachment/For-DiplomatEs/Practice-	5
retained for certificant information, personal information,	standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US	
and examination results.		
C. The policy must indicate the length of time records of	https://www.abgc.net/getattachment/For-DiplomatEs/Practice-	5
examination data and reports required to provide	standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US	
evidence of validity and reliability of the examination are		
retained.		
D. The policy must be consistent with any applicable laws	https://www.abgc.net/getattachment/For-DiplomatEs/Practice-	5
or agreements for retention, disposal, and destruction of	standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US "Record Retention	
documents.	Policy"	
Feedback:	,	

The certification program must have policies and		
procedures that cover all personnel involved in the		
certification program for the access, maintenance, and		
release of privileged and confidential examination and		
candidate information.		
Essential Elements:	https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook-	5
A. Signed confidentiality or nondisclosure agreements	April-2021_WEB-final.pdf	
from all personnel (including staff, certification board	01_ABGC CEC Manual revised 2021_FINAL (1).docx	
members, proctors, examiners, consultants and vendors,		
SMEs, and applicants/certificants) involved in the		
certification program must be maintained on record and		
enforced for protection of privileged information for		
current and prospective certificants.		
B. The certification program must identify all authorized	01_ABGC CEC Manual revised 2021_FINAL (1).docx	5
personnel with access to confidential examination,		
applicant, candidate, or certificant information.		
C. Applicant, candidate, and certificant privacy must be	https://www.abgc.net/getattachment/For-DiplomatEs/Practice-	5
maintained and any records policies established must	standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US	
protect confidential information of the individual.		
D. Personnel with access to confidential examination	https://www.abgc.net/getattachment/About-ABGC/Mission-	5
items must be restricted from eligibility for the	History/ABGC-Bylaws-approved-8-2019.pdf.aspx/?lang=en-US	
examination or developing or delivering preparatory	01_ABGC CEC Manual revised 2021_FINAL (1).docx	
courses or materials for a reasonable period after access		
has ended.		
E. Access to individual records must be restricted to the	https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook-	5
applicant, candidate, certificant, or authorized personnel	April-2021_WEB-final.pdf	
unless express written permission has been obtained to		
release any part of the information or a court order or		
other legal process requires the release of such		
information. Feedback:		

Standard 11: Conflict of Interest		
The certification program must demonstrate that policies		
and procedures are established and applied		
to avoid conflicts of interest for all personnel who are		
involved in certification decisions or examination		
development, implementation, maintenance, delivery,		
and revision.		
Essential Elements:	https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook-	5
A. The certification program must have a record of and	April-2021_WEB-final.pdf	
enforce signed conflict of interest agreements with all	01_ABGC CEC Manual revised 2021_FINAL (1).docx	
personnel involved in certification decisions or		
examination development, implementation, maintenance,		
delivery, and updating. The certification program must		
identify who may serve as a proctor, examiner, or judge		
for any examinations, and documentation must specify		
the rules and conditions for serving in these capacities.		
B. The certification program must have and enforce	https://www.abgc.net/abgc/media/documents/abgc-ceu-standards-	5
policies and procedures for recusing related personnel	final.pdf	
from certain tasks, discussions, or decisions if there is a	·	
conflict of interest in a particular circumstance but not in		
their overall capacity to serve.		
Feedback:	'	

https://customer.abgc.net/ABGCwcm/Credential_Verification/	5
ABGCwcm/Credential_Verification.aspx	
https://www.abgc.net/getattachment/For-DiplomatEs/Practice-	3*
standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US	
IW Training Presentation 2018.pptx	
	ABGCwcm/Credential_Verification.aspx https://www.abgc.net/getattachment/For-DiplomatEs/Practice-standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US

^{*} It's unclear based on the referenced documentation provided where the items are developed and stored and the security surrounding this process. The IW training slides mention permanently deleting items from their machines once written.

Standard 13: Panel Composition		
The certification program must use panels of qualified		
subject-matter experts (SMEs) to provide insight and		
guidance and to participate in job analysis, standard		
setting, and other examination development activities.		
Essential Elements:	https://www.abgc.net/getattachment/For-DiplomatEs/Practice-	3*
A. Each panel must represent the relevant characteristics	standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US	
of the population to be certified as the program defines		
them. The process of recruitment and involvement of		
SMEs must prevent the undue or disproportionate		
influence of any individual or group.		
B. The certification program must document information	https://www.abgc.net/getattachment/For-DiplomatEs/Practice-	5
about the qualifications of all panel members.	standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US "Selecting	
	Qualified Candidates for the Ballot"	
C. The certification program must document the	https://www.abgc.net/getattachment/For-DiplomatEs/Practice-	5
responsibilities entrusted to panels and panelists.	standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US (Several sections	
	within each committee)	
D. Documentation of panel meetings must include	https://www.abgc.net/getattachment/For-DiplomatEs/Practice-	5
decisions and recommendations of panelists.	standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US (Several sections	
	within each committee)	

^{*} The NCCA Standard lacks sufficient clarity on sample characteristics that a program should consider when defining theirs. However, since it does reference *disproportionate influence of any group*, it should be noted that item writers and other influencers are demographically skewed in areas such as gender and race, thus presenting the possibility of disproportionate influence of cultural bias.

defines and analyzes domains and tasks related to the purpose of the credential, and a summary of the study must be published. Essential Elements: A. The job analysis must lead to clearly delineated domains and tasks that characterize proficient performance. B. A job analysis must be conducted in accordance with sound psychometric practice. If a validation survey is not conducted, sufficient justification for relying only on non-quantitative data must be provided. C. The report of the job analysis must describe the methods, results, and outcomes of the job analysis study, including supporting documentation for each element and sufficient information to justify the study's findings and conclusions. D. A job analysis must be conducted frequently enough to ensure that the content specifications accurately reflect 2017 ABGC JAR - Final.pdf 5 2017 ABGC JAR - Final.pdf 5 2017 ABGC JAR - Final.pdf 5 2017 ABGC JAR - Final.pdf	Standard 14: Job Analysis		
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sufficient information to justify the study's findings and conclusions. D. A job analysis must be conducted frequently enough to ensure that the content specifications accurately reflect 2017 ABGC JAR - Final.pdf 5*	methods, results, and outcomes of the job analysis study,		
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D. A job analysis must be conducted frequently enough to ensure that the content specifications accurately reflect 2017 ABGC JAR - Final.pdf 5*	sufficient information to justify the study's findings and		
ensure that the content specifications accurately reflect	conclusions.		
·		2017 ABGC JAR - Final.pdf	5*
current practice.	ensure that the content specifications accurately reflect		
	current practice.		

Related commentary from Standard:

"6. Analysis of the demographic and professional characteristics of the survey respondents should validate that respondents are representative of the population as defined by the program. Certification programs should identify any patterns in responses based on respondent characteristics that differ substantially from the known characteristics of the population. They should also describe the methods used to mitigate such findings (e.g., weighting of results, subgroup comparisons)."

* The latest was conducted in 2017 and Sheila indicated via email that the next one is expected first quarter of 2022 which is frequent enough to capture any change in the practice.

Standard 15: Examination Specifications		
The certification program must establish specifications		
that describe what the examination is intended to		
measure as well as the design of the examination and		
requirements for its standardization and use, consistent		
with the stated objectives of the certification program.		
Essential Elements:	https://www.abgc.net/ABGC/media/Documents/ABGC-Exam-Specs-	5
A. The examination specifications must clearly state the	PUBLIC-effective-08-01-2018.pdf	
objective of the examination, including what the		
examination is intended to measure (e.g., cognitive		
knowledge, psychomotor skills, general competency) and		
the level of practice (e.g., entry, advanced, specialty, or as		
defined by the program) being measured.		
B. Specifications must address the critical elements of the	https://www.abgc.net/ABGC/media/Documents/ABGC-Exam-Specs-	5
whole examination program along with clear rationales.	PUBLIC-effective-08-01-2018.pdf	
Examination design considerations must be specified and	2017 ABGC JAR - Final.pdf	
explained clearly.	https://www.abgc.net/ABGC/media/Documents/	
	ScoringmethodologyALLFINALforWEBSITE.pdf	
	2020 ABGC CGCAB21A CGCAB22A EDR FINAL.pdf	
C. The plan for weighting sections of an examination must	2017 ABGC JAR - Final.pdf	5
be based on a job analysis; the plan must provide precise		
direction regarding the weighting structure for each		
section.		
Feedback:	<u>'</u>	

Standard 16: Examination Development		
Certification examinations must be developed and		
assembled in accordance with the established		
examination specifications and with sound examination		
development principles and practices.		
Essential Elements:	Item Writing Guide ABGC - 2017.pdf	5
A. A written and systematic item development plan must	IW Training Presentation 2018.pptx	
be developed and followed to ensure that examination		
content is accurate, current, and appropriate for		
candidates, regardless of format and candidate		
demographics.		
B. All versions of a certification examination must be the	2020 ABGC CGCAB21A CGCAB22A EDR FINAL.pdf	5
product of an appropriately designed, documented, and		
executed examination construction process.		
The sampling plan for the examination items must		
correspond to the examination specifications.		
When forms are to be translated into another language,		
the process must be designed to ensure that content is		
equivalent.		
• The established process must be documented to provide		
evidence of the comparability and integrity of content		
across forms of the examination.		
When the nomenclature used to classify items (e.g.,		
content outline) changes, then items must be reclassified.		
C. The development of subjectively scored items (scored	N/A	
by raters) and scoring rubrics must employ rigorous		
methods that maximize validity. When raters are used to		
score items, rater qualifications, training materials, and		
rubrics must satisfy the established specifications for		
standardization and the validity of scores.		
Feedback:		

Standard 17: Standard Setting		
A certification program must perform and document a standard setting study that relates performance on the examination to proficiency, so that the program can set a passing score appropriate for the certification.		
A. The procedures used to establish performance standards must be based on generally accepted measurement principles consistent with the purpose of the examination and item format(s) used.	ABGC Form 17 Standard Setting Report 2018.pdf	5
B. The certification program must document the standard-setting study in sufficient detail to allow for replication, including descriptions of the procedures followed, results, and appropriate interpretations. If the report is considered confidential, the organization must make a general description of the methods it used in the standard-setting study publicly available.	ABGC Form 17 Standard Setting Report 2018.pdf	5
C. The certification program must evaluate standards of proficiency frequently enough to reflect current practice.	"We are currently have a call for volunteers out for the next Practice Analysis Advisory Committee. Once we have that group seated, PSI will take over the process of conducting the next PA which will happen in the first quarter of 2022. Once the PA process is completed, then we will seat the passing point study committee. We will need to withhold immediate test results on that next exam administration to confirm the passing point the study committee set. That may be August of 2022 or it may be Feb. 2023 — I think that may depend on how much the detailed content outline changes and potentially on how many new questions need to be written for any new content. The last two PA's the content didn't change significantly so we were able to implement the new passing point with the next administration."	5

Standard 18: Examination Administration		
The certification program must develop and adhere to its policies and procedures for each examination administration. The procedures must ensure that all candidates take the examination under comparable conditions, safeguard the confidentiality of examinations, and address security at every stage of the process.		
Essential Elements: A. Examinations must be administered under secure and confidential protocols that restrict access to examination content to authorized individuals throughout examination storage, conveyance, administration, and disposal. Program policies must be in place to hold examinees accountable for improper behavior before, during, and after examination administration. The program must make a summary of security policies, incident review processes, and disciplinary procedures available to examinees.	https://www.abgc.net/getattachment/For-DiplomatEs/Practice-standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US "Examination Administration Compliance: Monitoring and Security"	5
B. Examinations must be administered using standardized procedures that have been specified by the certification program to ensure comparable conditions for all candidates and promote the validity of scores. The program must document and follow standardized examination administration procedures, including verification of candidate identity, regardless of the examination delivery or proctoring method. The program must establish and document procedures stating what it expects of examination administration personnel and the procedures to follow to ensure adherence to these requirements.	https://www.abgc.net/getattachment/For-DiplomatEs/Practice-standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US "Examination Administration Compliance: Monitoring and Security"	3*

Standard 18: Examination Administration		
C. Trained proctors must be used in the proper	https://www.abgc.net/getattachment/For-DiplomatEs/Practice-	2*
administration of examinations to minimize the influence	standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US "Examination	
of variations in examination administration on scores,	Proctors"	
regardless of the examination delivery method or		
examination format. Proctor training must include the		
management and reporting of irregularities. Proctors		
must have no conflict of interest or any ability to influence		
examination results. Proctors must ensure that approved		
accommodations have been provided. Proctors must		
confirm they have read and agreed to abide by the		
procedures outlined in the examination administration		
manual. For performance examinations, proctors must be		
provided with specifications for site layout and required		
tools and equipment to ensure standardized		
administration.		
D. The certification program must have processes to	https://www.abgc.net/getattachment/For-DiplomatEs/Practice-	5
monitor ongoing compliance with examination	standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US "Examination	
administration and security procedures.	Administration Compliance: Monitoring and Security"	
Feedback:	·	•
* There are monitoring procedures but it's unclear based on available documentation what the administration procedures are.		
** SOP mentions that PSI handles the proctor training and c	·	

Standard 19: Scoring and Score Reporting		
<u> </u>		<u> </u>
The certification program must employ and document		
sound psychometric procedures for scoring, interpreting,		
and reporting examination results.		
Essential Elements:	2020 ABGC CGCAB21A CGCAB22A EDR FINAL.pdf	5
A. The certification program must compute scores in a		
manner that is appropriate, given the design and format		
of the examination and the purpose of the certification.		
B. For performance examinations, the certification	N/A	
program must minimize the degree to which candidates'		
scores may be affected by having a particular rater or		
performance task.		
C. The certification program must document the	2020 ABGC CGCAB21A CGCAB22A EDR FINAL.pdf	5
procedures used in scoring, interpreting, and reporting	ABGC CGC CGCAB21A TAR FINAL.pdf	
examination results.		
D. All candidates must be provided information on their	https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook-	5
overall performance on an examination.	April-2021_WEB-final.pdf "FOLLOWING THE EXAMINATION"	
E. Failing candidates must be provided with information	(Missing/not reviewed)	1*
about their performance in relation to the passing		
standard. If the program provides feedback to candidates		
such as domain-level information, candidates must be		
provided guidance about limitations in interpreting and		
using that feedback.		
Feedback:		I

*Information stated to exist with information corresponding to major DCO areas by ABGC, but was not reviewed as part of this review.

Standard 20: Reliability		
The certification program must ensure that scores are		
sufficiently reliable for the decisions that are intended.		
Essential Elements:	2020 ABGC CGCAB21A CGCAB22A EDR FINAL.pdf	4*
A. Certification programs must calculate and report		
estimates of score reliability, decision consistency, and		
standard errors of measurement using methods that are		
appropriate for the characteristics of the examination.		
B. Estimates of score reliability and decision consistency	2020 ABGC CGCAB21A CGCAB22A EDR FINAL.pdf	5**
must be reasonable to support accurate pass/fail	ABGC CGC CGCAB21A TAR FINAL.pdf	
decisions. If the certification program makes pass/fail		
decisions based on subscores (i.e., the assessment is		
multiple-hurdle, or non-compensatory), the reliability of		
each subscore for which a pass/fail decision is rendered		
must be reasonable.		

^{*} KR-20 was provided but classification consistency is another measure of reliability that would be appropriate for a test with a passing cut score.

^{**} The lowest KR-20 estimates are likely due to small sample sizes, which could be explained in the reports.

Standard 21: Examination Score Equating		
The certification program must demonstrate that different		
forms of an examination do not advantage or		
disadvantage candidates because of differences in the		
content framework and/or difficulty of particular forms.		
Essential Elements:	2020 ABGC CGCAB21A CGCAB22A EDR FINAL.pdf	5
A. Each active form of the examination must align to		
currently applicable content specifications, consistent		
with the requirements of the equating model.		
B. The certification program must use statistical equating	2020 ABGC CGCAB21A CGCAB22A EDR FINAL.pdf	5
procedures grounded in accepted psychometric practices.		
C. When examinations are adapted across languages,	N/A	
certification programs must demonstrate that results		
obtained from adapted and source versions are		
comparable.		
D. For examinations that are subjectively scored (i.e.,	N/A	
using raters), certification programs must demonstrate		
that results are equivalent across raters and assessment		
tasks.		
Feedback:		

The certification program must require periodic		
recertification.		
Essential Elements:	https://www.abgc.net/for-diplomates/get-recertified/	5*
A. The certification program must have a statement of		
purpose for the recertification requirements that is		
consistent with the Commission's definition of		
recertification.		
B. The certification program must have a definition of	https://www.abgc.net/becoming-certified/certification-process/	5**
continuing competence that is consistent with the	https://www.abgc.net/becoming-certified/certification-exam-faqs/	
Commission's definition of continuing competence.		
C. Certification must be time limited with a specified	https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook-	5
beginning and end date to the period of certification. The	April-2021_WEB-final.pdf	
recertification period selected must be supported by a		
rationale that reflects how the relevant knowledge and		
skills for the certificants and for the field may change over		
time.		
D. Programs applying for accreditation must require	https://www.abgc.net/for-diplomates/get-recertified/	5
periodic recertification for all certificants.		
E. The certification program must have a mechanism to	https://www.abgc.net/becoming-certified/certification-exam-faqs/	5
verify that certificants have met the recertification		
requirements.		
F. The certification program must make all recertification	https://www.abgc.net/becoming-certified/certification-process/	5
policies and procedures (including statements of purpose,	https://www.abgc.net/becoming-certified/certification-exam-faqs/	
definitions, and rationales) publicly available.	https://www.abgc.net/ABGC/media/Documents/ABGC-Handbook-	
	April-2021_WEB-final.pdf	
	https://www.abgc.net/for-diplomates/get-recertified/	

Feedback.

^{*} Although I could not find the Commission's definition of recertification online.

^{**} https://www.credentialingexcellence.org/Resources/Importance-of-Continued-Certification

Standard 23: Quality Assurance		
The certification program must have a quality-assurance program that provides consistent application and periodic review of policies and procedures.		
Essential Elements: A. Mechanisms must be in place to promote delivery of program activities as intended, including such activities as application processing, examination preparation and publication, scoring, documentation, and financial management.	https://www.abgc.net/getattachment/For-DiplomatEs/Practice- standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US "Examination Administration Compliance: Monitoring and Security"	5
B. Processes must be in place to deal with errors found in program activities.	https://www.abgc.net/getattachment/For-DiplomatEs/Practice- standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US "ABGC Policy on dealing with errors"	5
C. Certification organizations must have policies and procedures requiring the regular review of examinations and the results obtained from their use, including the management and correction of examination-related errors.	https://www.abgc.net/getattachment/For-DiplomatEs/Practice-standards/ABGC-SOP-2020.pdf.aspx/?lang=en-US "ABGC Policy on dealing with errors"	5
Feedback:	,	1

The certification program must demonstrate continued compliance to maintain accreditation. Essential Elements: A. The certification program must annually complete and submit information requested of the certification agency and its programs for the previous reporting year. B. The certification program must submit any information that the Commission may require to investigate allegations of lack of compliance with NCCA Standards. The Commission reserves the right to conduct an audit to verify the integrity of the information submitted. C. The certification program must notify the Commission in writing prior to making any material changes in the program. https://www.abgc.net/becoming-certified/recognized-accrediting-bodies/ https://www.abgc.net/becoming-certified/recognized-accrediting-bodies/ https://www.abgc.net/becoming-certified/recognized-accrediting-bodies/ https://www.abgc.net/becoming-certified/recognized-accrediting-bodies/ https://www.abgc.net/becoming-certified/recognized-accrediting-bodies/ https://www.abgc.net/becoming-certified/recognized-accrediting-bodies/ https://www.abgc.net/becoming-certified/recognized-accrediting-bodies/ https://www.abgc.net/becoming-certified/recognized-accrediting-bodies/ https://www.abgc.net/becoming-certified/recognized-accrediting-bodies/	The conditional control of		
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