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## **CSA CODE OF PROFESSIONAL RESPONSIBILITY**

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# CSA CODE OF PROFESSIONAL RESPONSIBILITY

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## Foreword

Just as beneficially working with seniors requires additional skills and knowledge, it also requires an additional, higher ethical standard. We must give seniors more than the benefit of the best of our abilities. We must act with integrity and in a manner that recognizes an aging client’s circumstances.

To be a Certified Senior Advisor (CSA)<sup>®</sup> is to willingly accept and vigilantly uphold the standards in the CSA Code of Professional Responsibility. Those standards define the behavior that we owe to seniors, to ourselves, and to our fellow CSAs.

The reputation built over the years by the hard work and high standards of CSAs flows to everyone who adds the certification to their name. Conversely, any CSA who acts unethically diminishes the value of the certification to all CSAs.

Although CSAs are required to live up to the CSA Code of Professional Responsibility, the Code is a beginning rather than an end. To remain a CSA, one must be prepared to do more. Public demand, marketplace complexities, compliance issues, and regulatory provisions may require that a CSA abide by rules or standards in addition to those encompassed by the Code. In these instances, CSAs are obligated to follow the higher standard.

# CSA Code of Professional Responsibility

## **PURPOSE**

The CSA Code of Professional Responsibility (the “Code”) was created to provide ethical standards and rules of conduct for all persons who are certified to use the Certified Senior Advisor (CSA)<sup>®</sup> credential. The CSA Board of Standards, Inc. (sometimes referred to as the “Board”), an independent, nonprofit corporation established in the State of Indiana in October 2001, investigates formal complaints lodged against CSAs for alleged violations of the Code. The Board reviews all complaint cases and disciplines CSAs when appropriate.

For the purposes of this Code, a person who is certified is known as a CSA or Certified Senior Advisor. This Code applies to all CSAs.

CSAs are required to comply with the Standards and Rules set forth in this Code. CSAs must also follow all rules and regulations for their profession that are promulgated by state and federal law, licensing boards, state agencies, companies, and industry organizations of which the CSA is a member.

Most seniors are healthy, active, and alert. Yet, over time, some seniors may experience diminished physical and mental capacities — and may do their best to disguise these losses. Taken together, such characteristics make many seniors vulnerable to miscommunication, misunderstanding, and at worst, to being taken advantage of.

As a result, CSAs are obligated to follow a high standard of professional conduct. By earning the CSA certification, professionals have taken an extra step to earn the respect and trust of their clients — especially seniors and their families.

## **PARTS OF THE CODE**

**The Standards.** The Standards define the ethical and professional conduct to which CSAs must adhere while carrying out their business activities.

**The Rules.** The Rules are derived from the Standards. The Rules establish requirements for professional behavior that a CSA can readily apply to particular business situations.<sup>1,2</sup>

**The Disciplinary Procedures.** The CSA Board of Standards, Inc., an independent, nonprofit body, reviews complaints lodged against CSAs (“cases”) and takes appropriate action at the conclusion of each case review.

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<sup>1</sup>See Appendix A to the Code for Advertising Guidelines.

<sup>2</sup>See Appendix B to the Code for Usage Standards for the CSA Logo and Marks.

## THE STANDARDS

**Standard 1: Competence.** A CSA has an obligation to keep his/her professional training, skills, and knowledge current and comprehensive in order to competently provide professional services to clients. Such competency must be maintained and enhanced over time as a result of changes in legal, regulatory, and professional standards and processes. CSAs who sell products must meet the same standards with respect to product knowledge and suitability.

Most CSAs hold one or more professional registrations, licenses, or credentials. All CSAs must comply with the rules and regulations that govern the registrations, licenses and/or credentials they hold. CSAs are often affiliated with companies and/or employers that have their own rules for ethical business conduct; CSAs have an obligation to comply with these rules as well. Disciplinary action taken against a CSA by any regulatory or administrative body can carry the same weight as violations of this Code, and therefore may result in suspension or revocation of the CSA certification. A CSA who performs services, or offers to perform services, that are beyond the scope of his or her professional license and/or credential may be subject to Board action.

The CSA credential is a broad-based, value-added certification that enhances the registrations, licenses and credentials a professional already holds. The credential bestows on the individual who earns it a deeper understanding of seniors and the issues important to them, but it is neither designed nor intended to be a substitute for professional credentials.

**Standard 2: Honesty.** A CSA shall not lie, cheat, or steal. A CSA must accurately and completely communicate to clients and potential clients, both orally and in business materials, his or her professional licenses, credentials, and other business qualifications. Further, a CSA shall not omit from business materials or discussions — or otherwise disguise in technical, legal, or industry-specific terminology (“jargon”) — information that the CSA’s client or potential client would need to fully comprehend proposed products or services.

**Standard 3: Trustworthiness.** A CSA shall act in a trustworthy manner. This means that the CSA shall promptly and courteously address a client’s questions and concerns; shall perform professional services to achieve the best interests of the client;

and shall be dependable, honoring personal and professional promises made.

**Standard 4: Fairness.** A CSA shall conduct his or her professional activities fairly and impartially, using the same standard of care in performing business activities. Further, the CSA shall disclose all potential or perceived conflicts of interest that may arise in connection with providing professional services to clients, prospects, and business associates.

A CSA shall safeguard client, potential client, and business associate information, maintaining complete confidentiality unless such party has specifically released the CSA from such duty, or in the event that such information is required to be divulged in response to proper legal mandate.

**Standard 5: Professionalism.** A CSA shall serve the public, clients or patients, potential clients or patients, business associates, and employers with the highest degree of professionalism, exercising due diligence and acting in good faith in all matters; exhibiting appropriate demeanor and behavior in all business settings and transactions; maintaining good customer relationships with respectful, timely, and accurate service; following best practices in maintaining the books, records, and documentation of his or her business or practice; and upholding the standards of the CSA certification and of any other licenses or credentials he or she holds.

## **THE RULES**

### **INTRODUCTION**

The Rules are derived from the Standards, and both apply to all CSAs. The Rules are meant to demonstrate specific applications of the underlying Standard. Of course, every conceivable violation of a Standard cannot be captured in a specific rule. Thus violations of Rules and violations of Standards are equally enforceable.

### **RULES THAT RELATE TO THE STANDARD OF COMPETENCE**

**Rule 101.** A CSA holding professional licenses or credentials will comply with the rules, regulations, and ethical codes that govern the holders of such licenses or credentials.

**Rule 102.** A CSA shall stay current with governmental, regulatory, administrative, and professional standards or requirements that affect, or have the potential to affect,

such CSA's skill set and professional competence. These professional development steps include, but are not limited to, completing any Continuing Education (CE) requirements as mandated by such CSA's professional licensing authority, credentialing body, and by the CSA Certification Council ("Certification Council") in the form of CSA CE requirements for CSA recertification.

**Rule 103.** A CSA shall limit his or her professional advice or services to those areas in which he or she is competent. Otherwise, as warranted, such CSA shall direct his or her client to obtain, or shall obtain on their behalf, professional advice and/or services from other individuals qualified to provide them.

**Rule 104.** A CSA shall not perform, offer to perform, or imply in advertising or other communication an ability to legitimately perform professional services that are outside the scope of the CSA's professional practice, license, or credential.

**Rule 105.** Any CSA who has been named as a subject of a complaint, an indictment, an administrative order, a court issued injunctive order or an administrative investigation, or appears as an associated person to the subject of any such complaint, indictment, order or investigation, that has been filed by a governmental, regulatory or administrative body, including, but not limited to, by any attorney general or criminal prosecutor, may be administratively suspended by the CSA Board of Standards, Inc. at its discretion, subject to approval by the Certification Council, pending the results of further Board action. The Board may presume for any and all purposes that the allegations or findings of any such complaint, indictment or order are true.

**Rule 106.** A CSA shall not charge fees based solely on the basis of the CSA certification, and shall not assert or claim that the CSA certification qualifies him or her to give advice outside the scope of such CSA's professional occupation and license(s).

## **RULES THAT RELATE TO THE STANDARD OF HONESTY**

**Rule 201.** A CSA shall accurately and completely convey to clients and potential clients, whether presented orally or on business materials, his or her true profession and active professional licenses or credentials.

**Rule 202.** A CSA shall not solicit clients through false or misleading communications

or advertisements, whether written, oral, or electronic. This includes misrepresentation via an incomplete description of a product or service. See Appendix A, Advertising Guidelines for CSAs, for more detailed definitions and advertising rules.

**Rule 203.** A CSA shall not provide professional advice, services, or products through dishonesty, fraud, deceit or misrepresentation either directly or by omission. Further, such CSA shall not make false or misleading statements to a client, employer, governmental, administrative or other regulatory body or official, or any other person or entity.

**Rule 204.** A CSA shall not represent the views of the Certification Council, or the CSA Office of Certification or purport to represent such views, unless the CSA has been expressly authorized to do so. The CSA shall at all times clearly identify his or her personal or professional opinions.

#### **RULES THAT RELATE TO THE STANDARD OF TRUSTWORTHINESS**

**Rule 301.** Prior to establishing a professional relationship, a CSA may, upon request, provide a prospective client with references and recommendations from present or former clients, provided that such references and recommendations do not violate the confidentiality provisions of this Code.

**Rule 302.** A CSA shall secure client approval and authorization, in a form compliant with such CSA's credentialing or licensing guidelines, of all products and services prior to their delivery.

**Rule 303.** A CSA shall exercise reasonable and prudent professional judgment in providing professional services, shall provide such services in a timely manner, and shall not exceed the scope of his or her license, credential, or qualifications.

**Rule 304.** A CSA shall provide prompt, conscientious, and reliable service to clients, potential clients, employers, principals, and other persons, including responses to The CSA Office of Certification and CSA Board of Standards requests.

**Rule 305.** A CSA shall confirm that his or her senior clients fully understand the terms and risks of a particular product or service.



**Rule 306.** A CSA shall act in the best interest of the client, and shall make reasonable effort to fulfill every promise he or she has made to the client.

### **RULES THAT RELATE TO THE STANDARD OF FAIRNESS**

**Rule 401.** A CSA shall, in providing professional advice and services to a client, disclose to the client information that directly or indirectly affects the client relationship. This information includes, but is not limited to, the following:

- (a) Existing or potential conflict(s) of interest, changes in the CSA's business affiliation, mailing and e-mail address, company website, telephone number(s), as well as any changes to professional credentials, qualifications, and licenses.
- (b) Any other information required to be disclosed in accordance with, and in a manner compliant with, applicable laws, rules, and regulations.
- (c) Any ownership interests and/or fee reimbursement agreements or relationships with living communities, facilities, or service providers to which a client is referred.

**Rule 402.** A CSA shall safeguard his or her client's personal information, whether such information relates to a particular business endeavor or is incidental to the CSA/client relationship. Disclosure of a client's confidential information may be necessary in certain circumstances, including but not limited to:

- (a) Client well-being, legal mandates, or regulatory requirements; and
- (b) Defenses of the CSA against claims or charges of professional negligence, omission, or misconduct.

**Rule 403.** A CSA shall apply the same standard of care regarding confidentiality of information to employers as he or she applies to clients.

**Rule 404.** A CSA shall, when acting in the capacity of co-owner, partner, or principal of a company, apply the same standard of care regarding confidentiality of information to his or her co-owners, partners or principals in such company as he or

she applies to clients and employers.

**Rule 405.** A CSA shall, in a timely manner, abide by a client's request for status, records, or other pertinent information, providing that such request does not involve release of information that other parties may deem confidential.

**Rule 406.** A CSA shall equally apply the same standard of care in providing professional services to clients, potential clients, or other persons.

**Rule 407.** A CSA who is an employee shall provide professional advice and/or services while at all times complying with the lawful objectives of the CSA's employer as well as with the Standards of this Code.

### **RULES THAT RELATE TO THE STANDARD OF PROFESSIONALISM**

**Rule 501.** A CSA shall follow all credentialing requirements for earning and maintaining the CSA certification as put forth by the Certification Council. This includes, but is not limited to, complying with payment of the recertification fee and fulfilling any ongoing educational requirements.

**Rule 502.** A CSA shall use the CSA certification and/or marks in accordance with the rules and regulations for such usage as established by the Certification Council. See Appendix B, Usage Standards for the CSA Logo and Marks, for more detailed rules.

**Rule 503.** A CSA whose CSA certification has been revoked, or resigned shall not use the CSA certification and/or marks in any media or for any purpose whatsoever either orally or in writing.

**Rule 504.** A CSA shall avoid engaging in business conduct that reflects adversely on his/her integrity or fitness as a CSA.

**Rule 505.** A CSA shall demonstrate, on a personal and professional level, respect for other CSAs and other professionals. Such CSA shall apply fairness and integrity to his or her competitive business practices and refrain from denigrating other professions generally or other professionals specifically, whether they are engaged in like or dissimilar fields of endeavor.

**Rule 506.** A CSA who discovers or is made aware of, and can document or otherwise

substantiate, instances of professional misconduct on the part of another CSA, including but not limited to misrepresentation, negligence, fraud, and/or a violation of the CSA Code of Professional Responsibility, shall make written notification to the CSA Board of Standards, Inc.

**Rule 507.** A CSA shall carefully evaluate a client's or potential client's financial or medical circumstances (according to the CSA's field of expertise) prior to providing advice and/or services, and the CSA shall provide only the advice and/or services to such client that are appropriate to each client's particular circumstances.

**Rule 508.** A CSA shall carefully supervise subordinates to ensure that they provide client services of the same quality as is expected of the CSA.

**Rule 509.** A CSA shall, within 30 days of being informed of such proceeding, accurately and completely disclose to CSA Office of Certification any disciplinary, legal, or civil proceedings in which he or she is named, directly or by association, and shall promptly update the CSA Office of Certification of changes in the CSA's status as determined by the agency or body performing such review or proceeding.

**Rule 510.** A CSA who has been notified by the CSA Board of Standards, Inc. that he or she is the subject of a complaint cannot relinquish the CSA certification to avoid disciplinary action.

## **THE DISCIPLINARY PROCEDURES**

### **THE CSA BOARD OF STANDARDS**

The CSA Board of Standards, Inc. (the "Board"), an independent, nonprofit corporation, was established to review and resolve complaints lodged against Certified Senior Advisors for alleged violations of this Code. The Board has original jurisdiction over all such complaints and is solely and exclusively responsible for reviewing and adjudicating complaints and shares responsibility with the Certification Council for imposing sanctions involving a suspension for revocation of the right to use the CSA certification mark. The Board is solely responsible for imposing any sanction less than suspension or revocation of the CSA certification mark. The *CSA Board of Standards Policies and Procedures*, a collateral document to this Code available on the CSA website, articulates the operating policies and procedures by which the Board conducts its business.

In addition to all other powers and authority expressly granted and fairly implied by the other provisions of this Code, the Board is authorized to:

1. Impose an administrative suspension of a CSA's right to use the CSA certification mark with approval of the Certification Council. The administrative suspension is put in place prior to notifying the CSA that he or she has been named as the subject of a complaint — and in advance of the complaint hearing. The administrative suspension, which may be imposed by direct Board action or by the Board's designee at the direction of the Board with ratification by the Certification Council, suspends a CSA's right to use the certification mark if such CSA is named as the subject of, or is named as an associate to the subject of, a complaint or investigation by any governmental, licensing, or certifying agency or body authorized to instigate such action that charges, alleges, or investigates conduct of the CSA, which would, if proven, establish a violation of this Code by the CSA.

2. Enlist the aid or assistance of one or more CSAs in good standing to assist with investigations.

3. Appoint staff members to perform administrative functions of the Board.

4. Periodically report to the Certification Council on issues germane to Board operations.

5. Adopt amendments to the disciplinary procedures as presented in this Code.

6. Adopt such other rules, procedures, and policies, including any changes to the CSA Board of Standards Policies and Procedures, as may be necessary or appropriate to govern the internal operations of the Board or to interpret or establish an accepted interpretation of this Code so long as any of the foregoing are consistent with the Certification Council's right to control the granting, withdrawal, suspension and revocation of the right of CSAs to use the certification mark.

7. Impose sanctions against and discipline CSAs as provided for in this Code, subject to the Certification Council's approval of any proposed sanction of suspension or revocation of the right of CSAs to use the certification mark.

8. Report sanctions resulting in revocation of a CSA certification to the Certification Council.

## **THE COMPLAINT PROCESS**

Complaints can originate from the public, another CSA, or a state or federal regulatory agency or body. These complaints must be written and in the format required by the Board, as specified in the *CSA Board of Standards Policies and Procedures*.

The CSA Office of Certification may act as complainant and lodge a complaint if it discovers that a CSA has engaged in alleged unethical behavior whether or not that behavior has been documented in regulatory actions or civil or criminal court records.

All complaints must disclose the name of the complainant; the Board does not accept anonymous complaints. Complainants should assemble as much physical documentation as possible to support their version of events when sending a complaint to the Board. A CSA who is named as the subject of a complaint will receive a complete copy of the assembled complaint materials prior to the Board's review of the case. A CSA who is the subject of a complaint is obligated to respond to and cooperate with the Board's review of the complaint.

Complaints should be sent to the Board via:

Facsimile at: 303-758-8747

Email at: [\*\*complaints@csa-bos.org\*\*](mailto:complaints@csa-bos.org)

Or mailed to: CSA Board of Standards  
820 S. Monaco Pkwy. #338  
Denver CO 80224

Within seven days after it receives the complaint, the Board notifies the CSA who is named as the subject of the complaint. The Board requires that such CSA respond to the complaint in writing within thirty (30) days of the date of such notification.

After the CSAs response is received, a case review is scheduled for the next Board meeting based on the written and printed materials available to the Board.

Steps for the complaint process appear below:

1. The CSA Board receives a written complaint.
2. The Board Executive Director performs an initial review of the complaint case to determine its suitability for full Board review
3. The Board notifies the CSA that he/she is named as the subject of the complaint and requests the CSA's response and input.
4. The Board reviews the complaint case, with optional CSA participation. This review may span more than one Board meeting.
5. The Board dismisses the case or imposes such sanction as it deems appropriate, except sanctions involving suspension or revocation of the right to use the CSA certification mark must be approved by the Certification Council.
6. Once any necessary approval of the Certification Council is obtained, the Board notifies the CSA of the case determination.
7. If any discipline is imposed, the CSA is advised of the right to seek reconsideration of the Board's decision and if a suspension or revocation of the right to use the CSA certification mark is imposed, the CSA is also advised of the right of appeal.
8. Conditioned on the CSA having sought reconsideration and paid all applicable appeals fees, the Board of Standards Appeals Panel reviews any appeal filed by a CSA who disputes the any sanction of suspension or revocation of the right to use the CSA certification mark. .

These steps are covered in greater detail in the *CSA Board of Standards Policies and Procedures* document available on the CSA website.

## **DISCIPLINARY ACTIONS IMPOSED**

The Board is empowered to impose a range of sanctions, subject the approval of the CSA Certification Council for any sanction involving suspension or revocation of the right use the CSA certification mark, which include:

- 1. Administrative Suspension.** The Board may choose to impose an administrative suspension of a CSA's right to use the CSA certification mark prior to notifying the CSA that he or she has been named as the subject of a complaint — and

in advance of the initial complaint hearing. The Board may lift or continue the administrative suspension depending on its review findings.

**2. Private Censure.** The Board may order private censure of a CSA. This form of censure shall be an unpublished written reproach sent by the Board to a censured CSA. The Board may publish the case without naming parties involved.

**3. Public Censure.** The Board may order that a public letter of censure be issued against a CSA, which letter shall be a publishable written reproach of the CSA's behavior.

**4. Suspension.** The Board may order suspension of the right of the CSA to use the certification mark for a specified period of time, not to exceed three (3) years, for those individuals whose violations of the Code are deemed less egregious.

The Board may assign any CSA sanctioned with suspension or any lesser discipline certain educational or other tasks, completion of which is required in order to lift the suspension or to remain in good standing. The Board reserves the right to publish the fact of suspension together with identification of the CSA in a press release or by another method, although the fact of an administrative suspension is not published. After a suspension has been lifted, the CSA may be required to recertify his or her CSA certification under terms prescribed by the Board and in compliance with policies of the Certification Council for recertification.

**5. Revocation.** The Board may order permanent revocation of a CSA's right to use the certification mark. In the event of a permanent revocation, the Board reserves the right to publish the fact of the revocation together with identification of the CSA on the CSA website, or by another method. Unless otherwise mandated by the Certification Council, revocation of a CSA's right to use the certification mark shall be permanent.

Disciplinary decisions of the Board are subject to review at the request of the CSA in the manner provided by the Board's policies and procedures. The Board's current Disciplinary Review Procedures provide for a two-step review process: (1) all decisions of the Board which impose any discipline on a CSA are subject to reconsideration based upon a timely request which shows either the existence of additional evidence not reasonably available at the time the

CSA filed his or her response to a complaint or a serious misapplication of the facts to the Code, and (2) any decision which imposes discipline of suspension, other than an administrative suspension, or a revocation of a CSA's right to use the Certified Senior Advisor (CSA)<sup>®</sup> certification mark may be appealed to the CSA Board Appeals Panel following a timely request for reconsideration and payment of a filing fee and any required transcription deposit.

All requests for reconsideration must be filed within twenty (20) days of the date the CSA is given notice of the disciplinary decision. The Board's decision following reconsideration of the Board's initial decision or, if reconsideration is not timely sought, then the Board's initial decision is deemed final. Except for final decisions of the Board which impose discipline of suspension, other than administrative suspension, or revocation and for which a timely request for reconsideration has been made, there is no right to appeal a final decision of the Board. Any permitted appeal should be made as provided for in the Board's Policies and Procedures regarding Disciplinary Review Procedures.

Except for the publication of certain sanctions as provided above, results of Board case reviews are kept confidential. At its discretion, however, the Board may release details of specific case reviews to certain federal and state licensing and credentialing bodies and governmental and quasi-governmental regulatory agencies empowered to investigate and discipline members of certain professions, if the facts or charges being investigated or prosecuted by such bodies or agencies warrant such release.

A CSA may authorize the Board to release information concerning a case brought against that CSA using forms of release provided by the Board.



## Appendix A to CSA Code: Advertising Rules for CSAs

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### **INTRODUCTION**

Professionals who earn the CSA certification have demonstrated a special interest in learning more about the financial, health, and social issues important to seniors. They have also pledged to serve seniors according to the high ethical standards contained in this Code. Because advertisements or promotional activities are often the first point of contact between the CSA and seniors, all advertising done by a CSA, or done on a CSA's behalf, must withstand heightened scrutiny.

CSAs must agree to and abide by the advertising guidelines appearing in this Appendix A, regardless of whether the business materials or promotional activities in question are specifically defined under "Definition of Terms" below. Careful attention to the letter and the spirit of these rules will help a CSA ensure that his or her advertising materials and promotional activities are ethical.

### **DEFINITION OF TERMS**

*Advertisements.* Any materials designed to describe and encourage the purchase of a product or service. Examples of advertisements include flyers mailed or otherwise distributed, newspaper ads, correspondence, business cards, telephone solicitations, and any other materials designed for print, broadcast, web-based or other electronic media that encourage the purchase of a product or service.

*Promotional activities.* These activities include, but are not limited to, seminars, workshops, speeches, interviews, meetings, appointments, or other activities. Promotional activities may be designed for, or recorded in, print, broadcast, or electronic media. In the case of meetings or appointments, they may occur face-to-face with clients or potential clients in an office or home setting. Like advertisements, promotional activities describe and encourage the purchase of a product or service; typically they are held to develop leads for prospective sales.

## **GUIDELINES FOR CSA ADVERTISEMENTS**

CSAs are required to implement consistently the following elements when designing new advertisements, recasting existing ones, or purchasing pre-existing advertising packages or systems:

1. Proper identification. All advertisements produced by or on behalf of CSAs must contain the following information:

- (a) the name of the CSA
- (b) the name of the CSA's company
- (c) the business phone number and business address for the CSA
- (d) the CSA's profession, as established by professional credentials and licenses.

**2. Proper use of the CSA logo and/or CSA marks.** CSAs in good standing are entitled to use the CSA logo and certification marks in their advertisements, provided that they follow the usage rules appearing in Appendix B to this Code.

3. No misleading, deceptive, or confusing statements. Examples of misleading, deceptive, or confusing statements include, but are not limited to, those which claim or imply any of the following:

- (a) That the CSA possesses legal, financial, medical, social, or other professional expertise beyond the scope of what his or her professional licenses, certifications and formal training provide.
- (b) That the advertised products, if investment opportunities, carry “no risk,” are “risk-free,” or “completely safe”.
- (c) That the advertised products, if investment opportunities, guarantee an unrealistic rate of return; or that fail to disclose any limitations or charges that qualify investment terms or performance expectations.
- (d) That the advertised products or services have “no annual fees or sales charges” if the selling agent receives compensation for such products or services.

- (e) That the advertised products or services are endorsed (directly or implied) by a governmental agency, nonprofit or charitable institution, or senior organization if they are not.
- (f) That the advertiser or CSA is the same as, is connected with, or is endorsed (directly or implied) by a government agency, nonprofit or charitable institution, or senior organization if he/she is not.
- (g) That the advertised products or services, or the advertiser, or the CSA's business, is endorsed (directly or implied) in any way by the Certification Council.
- (h) That the reader may lose a right, a privilege, or benefits under federal, state, or local law if he or she fails to respond to the advertisement.

**4. Specific restrictions.** Advertisements for products or services offered by, or on the part of, a CSA must not:

- (a) Present the CSA, whether directly or indirectly, as able to provide products or services that are beyond the scope of the CSA's profession, as established by professional licenses or credentials.
- (b) Omit or obscure the CSA's true professional standing and qualifications.
- (c) Omit or obscure the true purpose of a seminar, presentation, workshop, or other promotional activity.
- (d) Disparage other professionals, professions, agencies, and organizations or the recommendations or policies they advocate.
- (e) Imply that other professionals, professions, agencies, and organizations in some way conspire, or have conspired, to issue policies or regulations for the purpose of overcharging or otherwise exploiting a particular group.
- (f) Attempt to alarm or panic members of an intended audience by misconstruing, highlighting, or sensationalizing selective data from

industry market trends or legal rules and regulations. No material fact or qualification may be omitted if the omission would cause the advertisement, or the element of the advertisement, to be misleading.

**5. Proper disclosure.** All CSA advertisements that promote a product or service must properly disclose information to intended audiences.

In practical terms, this means that:

- (a) The advertisement must reveal the true nature of the product or service promoted.
- (b) Web advertisements must disclose in which states or other regions the CSA is licensed or credentialed to offer products or services.
- (c) For advertisements that target persons aged 55 and over, the ad must disclose whether the CSA has organized a seminar, workshop, or other live event in order to develop prospect lists for possible follow-up.

**6. Disclosure Statement.** The Certification Council requires that Certified Senior Advisors who present themselves as CSAs give to consumers the following written disclosure statement prior to the purchase of a product or service:

*Certified Senior Advisors (CSAs) have supplemented their individual professional licenses, credentials and education with knowledge about aging and working with seniors. It is recommended that you verify the validity of any professional's credentials is which you conduct business and be sure you completely understand what those licenses, credentials and education signify. The CSA certification alone does not imply expertise in financial, health or social matters. For more details visit: [www.csa.us](http://www.csa.us)*

All CSAs are required to use the disclosure statement as of March 7, 2007. As of January 1, 2008, the CSA Board of Standards has the authority to investigate instances of noncompliance with this Rule 6.

The statement appears in CSA materials and is available on the CSA website. CSAs can use the materials provided by the CSA Office of Certification, or they are welcome to add this disclosure statement to their own business materials that they share with

consumers.

**7. Adherence to existing industry or regulatory guidelines.** Many state and/or federal agencies and corporations provide detailed advertising requirements specific to a particular profession. In addition, many companies publish guidelines for employees and other associated persons that cover advertising issues.

Furthermore, certain states or companies may provide “compliance review” services that will determine if an advertisement violates guidelines or is otherwise unsuitable for its intended audience.

A CSA is required to follow any available advertising guidelines as published by state and/or federal agencies, regulatory bodies, or individual companies, and, if available, make use of compliance review services for advertisements.

From time to time, the Certification Council may require that CSAs use specific language on their printed or electronic marketing materials, whether produced by them or on their behalf, in order for those materials to comply with the advertising guidelines in this Appendix A.

## Appendix B to CSA Code: Usage Standards for the CSA Logo and Certification Marks

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### **WHY HAVE GUIDELINES FOR USE OF THE CSA LOGO AND CERTIFICATION MARKS?**

The integrity of the marks reflects the trustworthiness of the CSA Certification program and your standing as a Certified Senior Advisor (CSA)<sup>®</sup>. Improper use of the logo and certification marks may denigrate their value, recognition, and distinction. It is paramount that the logo and marks be used correctly and consistently.

Of course, non-CSAs, and CSAs who are under certain sanction from the CSA Board of Standards, Inc. are not authorized to use the CSA logo or marks in any manner. These individuals may be subject to legal remedies if the Board or the CSA Office of Certification determines that they have wrongfully used the logo and marks.

Any CSA who encounters improper use of the CSA logo or marks on any communication, including advertisements, is encouraged to forward such communication to the CSA Office of Certification, with a brief explanation of where, when, and how they came across the communication.

### **WHAT ARE THE CSA CERTIFICATION MARKS?**

All CSAs in good standing are entitled to use the CSA marks in the conduct of their professions, as shown below:

- Certified Senior Advisor (CSA)<sup>®</sup>
- Certified Senior Advisor
- The CSA logo, which appears directly below:



*CSAs in good standing are authorized to use only the certification logo in business materials.*

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**I. BASIC RULES FOR THE CSA CERTIFICATION AND MARKS**



A. All CSAs acknowledge and agree that the Certification Council owns all rights, title, and interest in the certification and the marks.

B. All CSAs agree to conduct themselves and their businesses in a manner that does not cast an unfavorable light on the CSA certification and marks.

**II. GENERAL GUIDELINES FOR USE OF THE MARKS**

The following guidelines apply to use of the certification and/or marks in both printed and electronic media.



**Guideline 1.** The CSA certification and/or marks are to be used in connection with an individual, not a company or group of individuals.

<b>Correct Use</b>	<b>Incorrect Use</b>
John I. Jones, CSA Certified Senior Advisor	Jones & Co., CSA
Joan I. Jones, Certified Senior Advisor (CSA)®	Jones & Co., Certified Senior Advisors (CSA)
  John I. Jones, CSA	  Jones & Co., CSAs



**Guideline 2.** The ® and ™ symbols should be used properly when they appear with the certification and/or marks.

<b>Correct Use</b>	<b>Incorrect Use</b>
Joan I. Jones, CSA (in conjunction with spelling out <i>Certified Senior Advisor</i> )	Joan I. Jones, CSA® Joan I. Jones, CSA™
John I. Jones, Certified Senior Advisor (CSA)®	John I. Jones, Certified Senior Advisor (CSA)™
Joan I. Jones, Certified Senior Advisor®	Joan I. Jones, Certified Senior Advisor™



**Guideline 3.** The CSA logo cannot appear on any business materials alone; it must have the CSA’s name clearly associated with it.

Correct Use	Incorrect Use
 <p>John I. Jones, CSA</p>	

**Guideline 4.** The CSA logo must appear near (above, below, or adjacent to) the CSA’s name; don’t separate the CSA name from the logo with other elements.



Correct Use	Incorrect Use
<p>John A. Johnson, CSA</p>  <p>STRAIGHT LINE FINANCIAL SERVICES</p>	

**Guideline 5.** The CSA logo must be reproduced from original artwork and not modified in any way.

Correct Use	Incorrect Use
<p>John A. Johnson, CSA</p> 	



**Guideline 6.** When reproducing the logo, the resulting image should be of high quality.

Correct Use	Incorrect Use
<p style="text-align: center;">John A. Johnson, CSA</p> 	<p style="text-align: center;">John A. Johnson, CSA</p> 

**COLOR SPECIFICATIONS FOR THE CSA LOGO**

The CSA Office of Certification sends to newly certified CSAs a “Welcome Packet” and access to the CSA website portal for CSAs only, which contains electronic art files for printing the CSA logo. Color specifications for the logo elements appear below.



- For two-color printing, the logo may appear in all blue (see specs above).
- For monochrome printing, the logo may appear in grayscale or black and white.

**Guideline 7.** CSAs must **NOT** use the “CSA” acronym as part of a web URL: [www.csaplanner.com](http://www.csaplanner.com) is improper use.

**Guideline 8.** CSAs must **NOT** use the “CSA” acronym as part of an e-mail address: [csaplanner@msn.com](mailto:csaplanner@msn.com) is improper use.

## **I. THE CSA BOARD OF STANDARDS**

**The CSA Board of Standards, Inc. (the “Board”)**, a not-for-profit organization, was established in the state of Indiana in October 2001 pursuant to the provisions of the Indiana Nonprofit Corporation Act of 1991.

The Board was established to resolve complaints lodged against CSAs for alleged violations of the *CSA Code of Professional Responsibility* (“Code”) in the conduct of their business.

The Board reviews complaints against CSAs at its regularly scheduled meetings. The Board hears each complaint on its merits. Cases may be dismissed if the Board determines that the CSA did not violate the Code. If the Board determines that disciplinary action is warranted, it chooses a corrective action ranging from censure to revocation of the certification, although the CSA Certification Council must approve all sanctions involving the suspension or revocation of the CSA’s right to use the CSA certification mark. CSAs sanctioned with suspension or revocation of the CSAs right to use the CSA Certification mark may file an appeal with the Board of Standards Appeals Panel.

All CSAs acknowledge the disciplinary authority of the CSA Board of Standards, Inc. and agree to abide by the judgments it renders.

## **II. THE CSA CERTIFICATION COUNCIL AND CSA OFFICE OF CERTIFICATION**

**The CSA Certification Council.** The independent CSA Certification Council oversees the CSA certification program, including the establishment of the eligibility criteria to earn the CSA credential, the requirements for existing CSAs to recertify, and the design, development and administration of the CSA certification exam.

**The CSA Office of Certification.** The CSA Office of Certification is comprised of dedicated certification staff, employed or contracted, to manage and direct all operational and day-to-day activities of the certification program.

**A. THE CSA OFFICE OF CERTIFICATION AUTHORITY TO ACCEPT OR DENY ENROLLMENT APPLICATIONS**

The CSA Office of Certification may accept or deny an individual's application to enroll in the CSA certification program, based on compliance with the established eligibility criteria and on a review of any enforcement or disciplinary history on the part of the applicant.

**B. THE CSA OFFICE OF CERTIFICATION AUTHORITY TO WITHHOLD ENROLLEE CERTIFICATION**

The CSA Office of Certification may withhold from any candidate the right to use the CSA certification if the candidate has not met, or has failed to complete, eligibility criteria for earning the certification as established by the CSA Certification Council. In addition, the CSA Office of Certification may withhold certification if it determines that improprieties occurred during certification testing.

**C. THE CSA OFFICE OF CERTIFICATION AUTHORITY TO ENSURE PROPER USE OF CSA CERTIFICATION AND/OR MARKS**

The CSA Office of Certification will work with CSAs to confirm and/or correct proper use of the CSA certification, logo, and marks, according to guidelines set forth in the *CSA Code of Professional Responsibility*. If, after being notified by The CSA Office of Certification about improper use of the certification and/or marks, a CSA fails to correct the instance(s) of improper use, The CSA Office of Certification may escalate the matter to the CSA Board of Standards, Inc. for disciplinary action.

**D. THE CSA OFFICE OF CERTIFICATION AUTHORITY TO ADDRESS CASES OF WRONGFUL USE**

CSAs in good standing — those who have fulfilled all CSA-mandated requirements for earning and maintaining the CSA certification — are authorized to use the Certified Senior Advisor (CSA)<sup>®</sup> certification, and the CSA logo and marks, in the conduct of their business.

Individuals who are not CSAs in good standing are not allowed to present themselves as CSAs. They cannot use the certification, logo, or marks in any media and for any purpose. Those who use the CSA certification without the CSA Office of Certification authorization to do so are guilty of wrongful use. The CSA Office of Certification

reserves the right to notify regulators of CSA certification wrongful use on the part of such individuals.

The table below summarizes the CSA Office of Certification’s authority to address wrongful use of the CSA certification:

<b>For these individuals . . .</b>	<b>the CSA Office of Certification’s response to wrongful use is . . .</b>
Those who have not passed the certification examination	<ul style="list-style-type: none"> <li>• Cease and desist letter</li> <li>• Notification to state regulators</li> <li>• Further legal action if warranted</li> </ul>
Enrollees in the CSA certification program who have not completed eligibility requirements for certification	<ul style="list-style-type: none"> <li>• Cease and desist letter</li> <li>• Notification to state regulators</li> <li>• Disenrollment from CSA Certification Program</li> <li>• Mandatory 3-year period before application for re-enrollment is allowed</li> <li>• Further legal action if warranted</li> </ul>
Former CSAs whose certification has been suspended or revoked	<ul style="list-style-type: none"> <li>• Cease and desist letter</li> <li>• Notification to state regulators</li> <li>• Mandatory 3-year period before application for recertification is allowed</li> <li>• Further legal action if warranted</li> </ul>

**E. THE CSA OFFICE OF CERTIFICATION AUTHORITY TO INVESTIGATE DISCLOSURE INFORMATION**

Individuals who apply for the CSA certification program, are required to disclose to the CSA Office of Certification information about legal, administrative, regulatory, or other actions in which they are or have been involved. At its discretion, the CSA Office of Certification may request more information from the applicant or recertifying CSA and may take other steps to investigate these disclosures. On the basis of its findings, the CSA Office of Certification may accept or deny applications for certification or recertification, or may accept applications on a provisional basis pending the outcome of a civil, legal, or regulatory action.

**F. THE CSA OFFICE OF CERTIFICATION RIGHTS AT RENEWAL**

The CSA Office of Certification reserves the right to decline the recertification of any CSA who has not complied with the CSA Code, and/or other established criteria for maintaining certification with the Certification Council. The CSA Office of Certification also reserves the following rights at renewal:

- **Investigating “affirmative answers.”** The CSA Office of Certification is empowered to investigate “yes” disclosure answers on renewal forms in order to clarify or amplify the CSA’s explanation of the affirmative answer(s). Depending on the nature of the affirmative answer, the Office of Certification may ask the recertifying CSA to provide additional information, and/or it may decide to research the matter on its own.
- **Requiring sufficient explanations for affirmative answers.** In certain cases when the CSA Office of Certification deems an explanation of an affirmative answer incomplete, it reserves the right to require the CSA in question to provide further explanatory information. Depending on the nature of the affirmative disclosure, this additional information might include the following:
  - dates
  - locations
  - case numbers
  - case status
  - involved parties
  - summaries of charges and rebuttals
  - summaries of settlements or other judgments
  - copies of documents

CSAs who furnish such detailed information to the CSA Office of Certification demonstrate their integrity and professionalism — and expedite the review of their recertification.

### **III. CSA CONTINUING EDUCATION (CSA CE) RECERTIFICATION REQUIREMENTS FOR CSAS**

CSAs are required to complete 30 CE credits every three years. Credits may be obtained through several options, and must total 30. Credits earned beyond the 30 credit requirement may not be carried over into the next recertification cycle. For a full description of the recertification options, calculation of CE credits, acceptable forms of CE credits, and recertification policies affecting CSAs, please refer to the Recertification Handbook available on the CSA website.

To be eligible for credit for CE, all course topics must be directly related to seniors and issues affecting seniors. Acceptable topic areas include: ethics; financial, health, legal or social issues related to aging; spirituality and aging; general aging issues such as death and dying. Sales and marketing topics are not acceptable.

The following options, or combinations thereof, can be utilized to complete the 30 CE credits:

**Ethics:** Completion of a minimum of 3 CE credits specifically related to ethics is required for all CSAs during each 3-year recertification cycle. CSAs may earn the required 3 ethics CSA CE credits using the following options:

- i. Completion of the CSA online ethics module *The CSA Roles, Rules, and Responsibilities*, and complete the quiz. Three (3) CE units awarded.
- ii. One of the CSA ethics courses offered online by WebCE: [www.csa.webce.com](http://www.csa.webce.com)
  - Senior Market Sales Ethics (6 CE credits)
  - Maximizing Integrity in Decisions with Seniors (6 CE credits)
  - Effective and Ethical Communication with Seniors (6 CE credits)
- iii. Ethics courses approved for ethics CE credits by other professional organizations on topics directly related to seniors' needs and issues – for example, ethics courses offered by CFP, AICPA or CLTC, or a state L&H or real estate insurance license. These courses must be pre-approved by the Office on CSA Certification.

**Volunteering:** A maximum of 16 CE credits may be earned.

- i. 1 hour of CE credit may be earned for each 1 hour of volunteering for seniors. The maximum number of allowable CE credits earned by volunteering is 16.
- ii. 1 hour of CE credit may be earned for each 1 hour of volunteering as a qualified Subject Matter Expert actively participating in CSA examination development activities. The following activities are approved for volunteer credit: participating in a job analysis workshop, participating in item writing training and development including the submission of usable examination items, participating in passing score studies.

**Course Work and Conferences :** 1 day of participation in a professional conference will earn 6 CE credits; 2 (or more) days of participation in a professional conference will earn 12 CE credits. One hour of continuing education equals 1 CE.

- i. CE courses, seminars or workshops on topics directly related to seniors and approved or offered by a national trade, industry, licensing or regulatory association,

for example, the American Society on Aging (ASA); the National Council on Aging (NCOA); a national, state, regional, industry, trade, licensing or regulatory association; or an agency or organization including, but not limited to, the Certified Financial Planner Board of Standards (CFP), National Association of State Boards of Accountancy (NASBA), National Association of Securities Dealers (NASD), North American Securities Administrators Association (NASAA), National Association of Insurance and Financial Advisors (NAIFA), Society of Financial Service Professionals (SFSP), LOMA (Life Office Management Association), LIMRA (Life Insurance Management and Resource Association); NAB (National Association of Boards of Examiners of Nursing Home Administrators), SEC (U.S. Securities Exchange Commission), NAIFA (National Association of Insurance Financial Advisors) and federal and state departments of professional regulation.

- ii. State-approved insurance and other professional CE courses on topics directly related to seniors.
- iii. CE courses, seminars or workshops approved or offered by accredited universities and colleges on topics directly related to seniors.
- iv. WebCE courses on ethics and/or topics directly related to seniors
- v. Auditing the CSA Course Review (classroom or web)
- vi. Monthly webinars offered by SCSA

**Presentations:** 1 CE credit may be earned for each presentation, of at least 50 minutes in length. Credit may only be claimed once per presentation in the recertification cycle. A maximum of 10 credits may be earned. Presentations must be made on topics directly related to seniors.

**CSA Journal:** A maximum of 20 CEs may be earned.

- i. 5 CE credits for reading a Case in Point article and successfully completing two associated online quizzes. Case in Point articles feature a topic important to seniors, a related case study, and an associated handout for senior clients.
- ii. 10 CE credits for writing an article that is published in the CSA Journal.

## **THE CSA CERTIFICATION COUNCIL TERMS OF CERTIFICATION**

1. I understand that I am permitted to use the mark Certified Senior Advisor (CSA)<sup>®</sup> and related marks for a period of three years from the date of my CSA certification, assuming I remain a CSA in good standing. If I fail to comply with requirements to maintain the CSA certification I will immediately cease use of the mark(s) and will not hold myself forth as a CSA.
2. I understand that the CSA Board of Standards, Inc. has the authority to revoke my CSA certification, including any rights I may have to use CSA marks, if it finds that I have failed to comply with the CSA Code of Professional Responsibility and the Certification Council approves the revocation.
3. In consideration of the certification granted, neither the CSA Board of Standards, Inc. the CSA Office of Certification, nor the CSA Certification Council, its directors, officers, employees and others acting on its behalf, shall be liable to me for any actions taken or omitted to be taken in any official capacity or in the scope of employment, except to the extent that such actions or omissions constitute willful misconduct or gross negligence, and I hereby release the CSA Board of Standards, Inc., the CSA Office of Certification, and the CSA Certification Council, and each of their members, employees and agents, from any liability for such actions or omissions.
4. I will fulfill any ongoing recertification requirements. I must complete 30 CSA Continuing Education (CSA CE) hours every three years to recertify, which includes 3 ethics credits during each three-year cycle.
5. The CSA Office of Certification may suspend or revoke my CSA certification for nonpayment of recertification fees.
6. I will comply with all rules and requirements of the Certification Council. If certified as a CSA, I will comply with all standards and requirements that the Certification Council may issue from time to time, including usage standards for the Certified Senior Advisor (CSA)<sup>®</sup> certification and all other CSA proprietary mark(s). I acknowledge that the Certification Council or the CSA Office of Certification is not responsible for any usage standards put in place by outside entities.
7. I will accept and vigilantly uphold the standards in the CSA Code of Professional Responsibility.





THE CSA OFFICE OF CERTIFICATION  
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