

**TESTIMONY OF EDWIN J. PITTOCK**

**President**

**Society of Certified Senior Advisors**

**Before the  
Special Committee on Aging  
United States Senate**

**“Educating Professionals To Serve Seniors Better”**

**September 5, 2007**

Providing worthy advice to seniors on any product or service entails more than regulation; it entails education as well. Increasingly, regulation recognizes that seniors are a group apart who need special protections. It is now time to realize that educating professionals about aging is equally important. Yet our resources for teaching people about aging, the challenges it brings and the resources available to help, have not kept pace with a growing senior population. There is only a one in six chance that an American university offers one or more courses in gerontology. Few companies who have seniors as customers require any education for their employees. SEC Chairman Cox put it well at last year's Senior Summit when he asked what companies were doing to train their employees to work with an aging client base. The answer? Not much. Seniors deserve better.

Whatever work a professional does with seniors, he or she will do it better by supplementing their knowledge with training from an organization such as Society of Certified Senior Advisors. Just as learning a foreign language is helpful when working with people who speak that language, so is learning about seniors helpful when working with seniors. Conversely, learning a language doesn't qualify someone to practice medicine, law, etc. SCSA is not a licensing authority.

We are an education company that awards the Certified Senior Advisor (CSA)<sup>®</sup> designation upon successful completion of our complete training program, including:

- three online ethics modules,
- an online module on the *CSA Code of Professional Responsibility*
- and a comprehensive final exam.

Our training teaches people how to work with seniors and gives them information that is useful personally as well. It does not teach them a profession or qualify them to do investment counseling, home health care, estate law or any other specific professional pursuit. No CSA can use the designation alone, for example, to sell securities or insurance.

SCSA is a credentialing organization that educates, tests and certifies persons as a Certified Senior Advisor (CSA)<sup>®</sup>. I formed SCSA was formed in 1997 with the help and guidance of gerontologists, doctors, attorneys, accountants, financial planners and other experts who believed there was a need for a standardized education for professionals who work with seniors. What emerged from their work was a

curriculum designed to give professionals who work with seniors a greater understanding and appreciation of the challenges facing seniors, and to:

- Help seniors by adding and applying senior-specific knowledge to their own professional skills
- Add value to their interactions with seniors through improved communication, better appreciation of senior-specific issues, increased empathy, better understanding and greater awareness of resources available to seniors.

SCSA is predicated on the belief that a combination of health, financial and social factors dominates the lives of the majority of seniors. We believe that understanding what these factors consist of -- and how they work together -- can enable professionals to be of greater value to seniors (including where to find professional help if a senior's needs are outside the CSA's area of functional expertise). Understanding these dynamics benefits both the senior and the professional who has gone through the CSA curriculum.

The CSA Designation Program covers 23 subject areas that, taken as a whole, define and describe the lives of the majority of today's seniors. The CSA textbook, *Working With Seniors: Health, Financial, and Social Issues*, is divided into six parts with these chapters:

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**PART 1: AGING**

Chapter 1	Trends in Aging
Chapter 2	Aging and Society
Chapter 3	Physiological Changes of Aging
Chapter 4	Mental Health, Grief, and Loss in Later Life
Chapter 5	The Experience of Aging

**PART 2: AGING WITHIN THE FAMILY AND COMMUNITY**

Chapter 6	The Family and Social Support Systems
Chapter 7	Caregivers and Caregiving in America
Chapter 8	Housing
Chapter 9	Home and Community-Based Services

**PART 3: HEALTH AND MENTAL HEALTH**

Chapter 10	Chronic Illness in Seniors
Chapter 11	Senior Nutrition, Fitness, and Healthy Lifestyles
Chapter 12	Cognitive Aging

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Chapter 13 Spirituality and Aging

Chapter 14 End-of-Life Planning

**PART 4: FINANCIAL LITERACY**

Chapter 15 Estate Planning

Chapter 16 Financial Choices and Challenges for Seniors

Chapter 17 Long-Term Care Coverage

Chapter 18 Funeral Planning

**PART 5: MEDICARE, MEDICAID, AND SOCIAL SECURITY**

Chapter 19 Medicare

Chapter 20 Medicaid and Seniors

Chapter 21 Social Security and Supplemental Security Income

**PART 6: THE COMMUNITY OF CERTIFIED SENIOR ADVISORS**

Chapter 22 Ethics in Doing Business with Seniors

Chapter 23 Marketing to Seniors

Chapter 24 Now That You Are a CSA

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The CSA designation is a value-added education and skill set in aging that improves the quality of a professional's interactions with seniors. A CSA adds senior-specific knowledge to their existing professional skills and abilities to:

- Better understand the age-related needs of seniors
- Better communicate with seniors
- Have a wider knowledge of the resources available to seniors and their families
- Understand the ethical standards of working with seniors
- Be more empathetic to seniors
- Have more informed transactions with seniors

Not everyone understands every one of the hundreds of designations available to professionals, including CSA. We are therefore committed to taking all necessary steps to inform people about what we teach and what CSAs do, some of which are detailed below.

**The CSA Designation.** The CSA Designation Program teaches people from all walks of life how to benefit seniors through better communication, greater empathy, wider understanding of seniors' circumstances and the resources available to them.

We believe that seniors deserve to work with professionals who have demonstrated enough of a commitment to seniors that they have gained education about aging. SCSA is not a company that “qualifies” or “certifies” anyone “as a specialist in senior investments,” nor do we represent ourselves as such. CSAs who represent themselves as such based solely on their holding the CSA credential are subject to action by the independent CSA Board of Standards, including revocation of their designation. CSAs also may not charge fees solely on the basis of the CSA designation.

To better understand what the CSA designation is, it’s important to know what it is not: the CSA designation is not a designation that qualifies someone to give financial advice, sell financial products, treat illnesses, buy and sell real estate, give legal advice, etc. In no way is it a substitute for any state or federal licensing requirement. SCSA has always maintained that the Certified Senior Advisor (CSA)<sup>®</sup> designation is a supplement to a professional’s existing licenses and credentials. Although many CSAs are financial professionals (about 650 CFPs, for instance, have added our training), many are not. Others are attorneys, health care professionals, funeral directors, and social workers.

**SCSA Disclosure.** As an affirmative step to create broader understanding of the CSA designation, SCSA developed a first-of-its-kind disclosure statement in early 2007. We developed it in part based on our communication with regulators. The Disclosure Statement dispels any confusion about the CSA designation and reduces the potential for someone to wrongfully use it:

***Certified Senior Advisors (CSA) have supplemented their individual professional licenses, credentials and education with knowledge about aging and working with seniors. Know what those licenses, credentials and education signify. The CSA designation alone does not imply expertise in financial, health or social matters. Details: [www.csa.us](http://www.csa.us)***

Inquiring about licenses, credentials and education is precisely what regulators advise consumers to do.

We post our Disclosure Statement prominently on multiple pages on our web site. We display it in our printed publications: *CSA Journal*, *Significant Summaries* and *Senior Spirit*. We present it on educational brochures we produce for seniors, including *You Deserve Professional Senior Advice*, *Aging Wisdom for Ageless Living* and *Social Security, Medicare, Medicare Supplements, Medicaid, In-Home Care, Long-Term Care Insurance Basics*. The Disclosure Statement also appears on a brochure we use to interest potential enrollees in our training. Finally, beginning January 1, 2008, any CSAs not already using the disclosure will be required to provide the disclosure in writing to clients prior to the completion of a transaction.

**Myths about CSA.** Any suggestion that the CSA designation alone is sufficient for someone to sell real estate, insurance, health care, estate planning or anything else

is both ridiculous and false. The belief that our exam is “easy” is belied by the fact that 22% of students fail it and do not become designated. Also false is the suggestion that SCSA represents Certified Senior Advisors as “expert” by virtue of their CSA designation (the Disclosure Statement above is crystal clear on this point). Any implication that the name of our designation in and of itself is “misleading” or “confuses seniors” is unsupported by any empirical data and contrary to the plain meaning of the language (“certified” meaning “having met a standard,” “senior” meaning persons over age 65, and “advisor” meaning “one who offers advice within a profession and direction to resources outside their expertise.”)

**State and Federal Action on Designations.** The issues about the designation noted above may be a moot point, because, as you may know, the Commonwealth of Massachusetts Securities Division believes that a way to protect seniors is to require any designation with certain words in its name (including “senior”) to become accredited through one of two national organizations. It enacted a rule to this effect earlier this year. The North American Securities Administrators Association (the oldest international organization devoted to investor protection) has stated they most likely will advocate this Fall that other states adopt a similar standard. We intend to comply with these rules just as we have always complied with every other state and federal rule. We have already begun the process to achieve accreditation for the CSA Designation Program through the National Commission for Certifying Agencies.

**Transparency of Training.** We also intend to remain among the most open and transparent of designations. A number of state and federal regulators have gone through our training at our expense. We have a standing invitation to insurance and securities regulators and to compliance officers from a variety of companies to do the same. Representatives from the Securities and Exchange Commission and NASD (now FINRA) also have gone through our training. In June, 2006, shortly after he was assigned to the Senate Special Committee on Aging, we invited our home state senator, Ken Salazar, to send a representative of his staff through our training in Denver. We would be happy to have the members of the Senate Special Committee on Aging or their representatives go through our training.

**Seniors As a Special Class.** As states seek special protections for seniors regarding sales of products and services, it is becoming increasingly acknowledged that seniors are a special group that is particularly vulnerable and susceptible to financial abuse. We agree completely with that premise. Yet we are unaware of any state or federal requirement that anyone working with seniors gain even a minimal amount of knowledge (unless it is within their own discipline) about how seniors are different and the optimal ways to work with them, such as determining whether a client has dementia and being able to recognize factors that can lead to abuse. We believe that seniors deserve to work with persons who have knowledge about seniors’ differences.

It seems illogical to us (and, we would hope, to the Committee) that seniors can simultaneously be recognized as needing special and separate protections, yet no additional education is required of those who work with them. It is even more illogical for someone to argue that if one does seek additional training that is not required by any regulatory agency, that training is inadequate, invalid or lacks “rigor.” The fact is that many persons who present themselves as qualified to work with seniors have little or no specific education or training in aging issues. Both the Securities and Exchange Commission and the NASD (now FINRA) have stated their belief that it does require additional knowledge and skills to work with seniors.

**The CSA Board of Standards and the *CSA Code of Professional Responsibility*.** Cases in which the CSA designation is misused—whether brought to our attention via regulatory action, a public complaint, or our own investigation—are brought before the independent, non-profit CSA Board of Standards for disciplinary review. Actions the Board takes against CSAs are posted on our website, [www.csa.us](http://www.csa.us).

The CSA Board of Standards performs monthly reviews of cases that allege violations of the 26-page *CSA Code of Professional Responsibility* (“CSA Code”) on the part of CSAs.

All CSAs must sign and agree to follow the standards, rules, and guidelines presented in the CSA Code.

The Code is clear about the nature of the CSA designation:

The CSA credential is a broad-based, value-added designation 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.

Multiple Code rules disallow misrepresentation:

Rule 103. A CSA designee shall limit his or her professional advice or services to those areas in which he or she is competent. Otherwise, as warranted, such CSA designee 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 designee 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 designee’s professional practice, license, or credential.

Rule 202. A CSA designee 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.

Multiple Code rules require ethical business conduct:

Rule 302. A CSA designee 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 305. A CSA designee shall confirm that his or her senior clients fully understand the terms and risks of a particular product or service.

Rule 306. A CSA designee 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.

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

In short, CSAs are obligated to conduct their business affairs fairly and ethically, and keep the best interests of their (senior) clients first and foremost in mind.

**Enforcement of the CSA Code of Professional Responsibility.** Over the past five years, the CSA Board of Standards has heard 127 cases, resulting in 33 revocations of the designation and 27 suspensions.

**State and Federal Actions Involving CSAs.** When persons are the subject of an enforcement action, it is a betrayal of all of us: the schools that educated them, the companies that hired them, the regulators who licensed them and the credentialing organizations that conferred on them their designations.

CSAs are taught to conduct themselves legally and ethically. We have noted the cases of those few who do receive complaints in Board of Standards actions in an enclosure.

No regulator has ever cited something we included in the course, or something we excluded from the course, as the cause of harm done to a senior.

On a more anecdotal level, we note with regret that one CSA was among the 321 total registered representatives disciplined by the NASD in 2006 in the states of Massachusetts, Florida, Arizona, California and Texas. Four of those states are where regulators conducted examinations of so-called “free lunch” seminars aimed at seniors (*Wall St. Journal*, “Seniors Seminars Get Scrutiny,” May 30, 2007). SCSA referred the information about the single CSA identified to the CSA Board of Standards, where the case is now under investigation.

A separate effort in April to match records of state insurance and securities enforcement actions with the 12,000-plus membership of SCSA resulted in SCSA filing complaints against nine CSAs for “intentional nondisclosure.”

“Intentional nondisclosure” means that a CSA did not disclose a government, regulatory, or administrative action, as required, on his or her enrollment application or yearly renewal questionnaire. To determine whether this occurred, SCSA scoured publicly posted enforcement action data from state regulatory web sites to identify whether any CSAs were the subject of those actions. For those states that do not post enforcement data, SCSA encourages regulators to notify it of any actions taken against SCSA members.

If SCSA discovers that a CSA has made a false statement on a renewal form, he or she is subject to having their designation revoked by the CSA Board of Standards.

**Relationships with Other Companies and Products.** SCSA does not endorse any products or services.

**Development of the CSA Curriculum.** The CSA curriculum was developed by gerontologists, geriatric M.D.s, elder law attorneys, clergy and senior health care professionals. Among the contributors to the SCSA textbook, *Working with Seniors: Health, Financial, and Social Issues*, were:

- Robert C. Atchley, PhD, Chair, Department of Gerontology and Director, Research Office, Naropa University, in Boulder, Colorado. His gerontology interests include adult development, spiritual development, long-term care, public policy, work and retirement, health change and disability, and family issues. Dr. Atchley was President of the American Society on Aging from 1988 to 1990 and has also served in numerous leadership positions in the Gerontological Society of America and the Association for Gerontology in Higher Education. He is associate editor of the *Encyclopedia of Gerontology* and was founding editor of the journal, *Contemporary Gerontology*. From 1974 to 1998, he was director of the Scripps Gerontology Center at Miami University in Oxford, Ohio. He has received more than a dozen awards for his scholarship, teaching, and professional service in the field of aging. He is author of over 100 articles and book chapters in social gerontology literature

and more than a dozen books and research monographs, including "Understanding American Society" (1970), "The Sociology of Retirement" (1976), "Aging: Continuity and Change" (1987), "Continuity and Adaptation in Aging: Creating Positive Experiences" (1999), and his tenth edition of his introductory gerontology text, "Social Forces and Aging" (2003).

- Harry R. Moody, PhD, director of academic affairs, AARP; senior associate with the International Longevity Center-USA and Senior Fellow of Civic Ventures. Dr. Moody is the author of over 100 scholarly articles and book chapters, as well as a number of books including: "Abundance of Life: Human Development Policies for an Aging Society" (Columbia University Press, 1988); "Ethics in an Aging Society" (Johns Hopkins University Press, 1992); and "Aging: Concepts and Controversies", a gerontology textbook now in its 3rd edition. His most recent book, "The Five Stages of the Soul," was published by Doubleday Anchor Books (1997) and has been translated into seven languages worldwide. A graduate of Yale (1967) and a Ph.D. in philosophy from Columbia University (1973), Dr. Moody taught philosophy at Columbia, Hunter College, New York University, and the University of California at Santa Cruz. From 1999 to 2001 he served as National Program Director of the Robert Wood Johnson Foundation's Faith in Action and, from 1992 to 1999, was Executive Director of the Brookdale Center at Hunter College. Before coming to Hunter, he served as Administrator of Continuing Education Programs for the Citicorp Foundation and later as Co-Director of the National Aging Policy Center of the National Council on Aging in Washington, DC. He is known nationally for his work in older adult education and recently stepped down as Chairman of the Board of Elderhostel. He has also been active in the field of biomedical ethics and holds appointment as an Adjunct Associate of the Hastings Center.
- Gregory A. Hinrichsen, PhD, director of psychology training, the Zucker Hillside Hospital and associate professor of psychiatry, Albert Einstein College of Medicine. During 30 years in the field of aging, he has provided clinical services, conducted research, directed psychology internship and fellowship programs, and had leadership roles in state and professional organizations. He is past president of APA's Division 12, Section II (The Society of Clinical Geropsychology) and past chair of APA's Committee on Aging. Author of over 60 articles, his research work has addressed family issues in late-life depression, dementia, and first-episode schizophrenia; adaptation to medical problems; and geropsychological education. He has clinical expertise in the application of Interpersonal Psychotherapy (IPT) to older adults. He consults on and conducts IPT workshops and seminars nationally and internationally. In September, Dr. Hinrichsen will begin a congressional fellowship sponsored by the American Psychological Association during which he will work in the office of a senator or congressman advising on public policy and aging issues.

- Stephen M. Golant, PhD, Center for Gerontological Studies, University of Florida; Previously, he was an Associate Professor in the Committee on Human Development (Department of Behavioral Sciences) and in the Department of Geography at the University of Chicago (1972 - 1980). He received his PhD in social geography and social gerontology from the University of Washington in 1972 and his B.A. (1968) and M.A. degrees (1969) in geography from the University of Toronto. Dr. Golant has been conducting research on the housing, care, mobility, and transportation needs of the elderly population for most of his academic career. He is a Fellow of the Gerontological Society of America, serves on the editorial boards of the *Journal of Gerontology: Social Sciences*, *Journal of Aging Studies*, *CSA Journal (Society of Certified Senior Advisors)* and *Journal of Housing for the Elderly*. He was formerly Secretary-Treasurer of the Behavioral and Social Sciences Section of the Gerontological Society of America, Editor-in-Chief of the magazine, *Responses to an Aging Florida*, published by the Florida Council on Aging, and on the Board of Trustees of the Florida Council on Aging. He has written or edited over 100 papers and books, including *Housing America's Elderly: Many Possibilities, Few Choices* (Sage Publications, 1992) and the *CASERA Report (Creating Affordable and Supportive Elder Renter Opportunities)*, 1999.

He has been a consultant or adviser to various consulting firms, universities, state government agencies, and national organizations including Hearst Business Communications Corporation; the American Association of Homes for the Aging; the American Association for Retired Persons; Bloomington Hospital, Indiana; Buehler Center on Aging, McGaw Medical Center, Northwestern University, Chicago; the Florida Department of Transportation; the Florida Department of Education; the Florida Council on Aging; Margaret Lynn Duggar and Associates; the Quantum Foundation; Palm Beach county, Florida, Area Agency on Aging; Palm Beach County, Florida, Health Care District; the Shimberg Center for Affordable Housing, University of Florida; the Florida Policy Exchange Center, University of South Florida; the Florida Task Force on Availability and Affordability of Long-Term Care Report to the Florida Legislature; Assisted Living Options Hawaii, and Econometrica.

- Elizabeth Vierck, M.S.; Former analyst, researcher, writer working for the US Senate. Author of "America in Transition: A Demographic Analysis of the Elderly" U.S. Senate Special Committee on Aging (1985), "The Long-Term Care Challenge" U.S. Senate Special Committee on Aging (1990), "Paying for Health Care After Age 65" (1990) and a number of other books and articles. Currently writing "American Seniors: A Factbook on Demographics, Health, and Aging."

- Lee E. Norrgard, Senior Program Coordinator in the membership cluster of AARP. He frequently serves as spokesman for the Association on the consumer needs of older adults. Norrgard has authored many consumer publications, magazines and journal articles. He has co-authored several books including *Final Details: Making End of Life Decisions, and Consumer Fraud*. In 1998, the National Association of the Attorneys General (state attorneys general) honored him with their Presidents Award. In 1999, the Inspector General of the Department of Health and Human Resources presented Norrgard with a Cooperative Achievement award, and in 2000, AARP conferred him with awards for Sustained Excellence in teamwork.
- Michael Snowdon, professor of financial planning and insurance at the College for Financial Planning in Greenwood Village, Colo. He has been the senior director of corporate sales, managed the College's CFP Professional Education program and has written and contributed to several financial planning texts for the College, National Underwriter, and the CSA Society. In addition to leading training sessions at a number of financial services companies, Snowdon has written and contributed to articles for several financial publications and Web sites, including *AP Primetime, Bloomberg Wealth Manager, Forefield Advisor, Insure.com, Insweb.com* and *OnMoney.com*. Prior to joining the College, Snowdon was a general principal and financial planning specialist for an international financial services company. He also had his own financial planning firm. Snowdon is a CFP certificant and also holds the Chartered Mutual Fund Counselor (CMFC) designation.
- Erin E. Emery, PhD, Rush University Medical Center, with practice emphasis in geropsychology, health psychology, psychotherapy with older adults and psychotherapy with medically ill adults.
- Mary Jean Kindschuh, Esq., attorney and counselor at law, is a member of the Trusts and Estates Section and Elder Law Section for the Colorado Bar Association. She served as a member of the governing Council of the Trusts and Estates Section of the Colorado Bar Association during 2002 and 2003. She is also a member of the Elder Law Institute Advisory Board at the University of Denver College of Law. Ms. Kindschuh has served on various committees of the Trusts and Estates Section of the Colorado Bar Association, including the Continuing Legal Education Committee, and as the CLE Luncheon Coordinator for the Section. She served as co-chair of the 2000 Advanced Elder Law Institute continuing legal education seminar presented by the Elder Law Institute Advisory Board and the University of Denver College of Law.
- V. Raymond Ferrara is a Registered Principal with the NASD, a Certified Financial Planner licensee, and a Certified Senior Advisor. He has served on

the Board of Directors for the Financial Planning Association (FPA), Institute of Certified Financial Planners (ICFP), and National Advisor's Trust Company (NATC). He is a member of the Board for Great Companies, LLC, a private money manager, Morton Plant Mease HealthCare, BayCare Health System, and the Clearwater Regional Chamber of Commerce.

**Standards.** The CSA Designation Program is an entry-level introduction to the health, social and financial issues of aging that affect the majority of seniors in the U.S. It supports the protection and ethical treatment of seniors by setting the requirement that a CSA puts the senior's best interests first, regardless of any financial or other gain to the CSA, and treats the senior with dignity, respect and fairness. This requirement is stated clearly throughout the course in various ways and reinforced in the *Critical Issues in Aging* online courses that are part of CSA designation requirements.

The CSA course design is based on our belief that awareness of the three aspects of aging is necessary to meet this expectation. The course does not teach professionals how to sell a product; rather, it teaches professionals to serve seniors as people who have common and diverse needs, thus preparing professionals to:

- Recognize and discuss the health, financial and social aspects of aging with seniors
- More accurately and easily identify seniors' needs
- Better relate to and communicate with seniors
- Advise seniors where to find help if their needs are outside the CSA's specialty

To assure that it is accurate and relevant, the CSA course is, written, edited and reviewed by experts in aging and experienced professionals who work with senior clients (see list of textbook contributors). To maintain the currency of these standards, SCSA continues to use experts to review and update the course content as needed in response to changes in the environment such as Medicare and Medicaid rules, and to student questions and feedback (orally and through written course evaluations). The CSA exam tests what is in the textbook, follows industry standards for item writing (for example, the CSA exam does not contain negatively-worded questions such as "NOT," "EXCEPT"), is reviewed by a psychometrician before being administered, and is also updated as needed.

In addition, the CSA course is designed and delivered using adult learning principles, for example, a variety of media and instructional strategies are used such as PowerPoint lectures, stories and examples that illustrate key concepts, experiential demonstrations of the experience of aging, print materials (textbook, PowerPoint, note-taking book), CDs, and review questions. There are also lists of community and government resources at the end of the textbook chapters that CSAs can use to guide seniors to services and information that are outside of the CSA's specialty.

**Continuing Education Requirements.** SCSA requires 18 hours of continuing education every three years from its members. Members can meet the requirement through 18 hours of ethics training, or through six hours of ethics training and 12 hours of volunteer service to a non-profit agency devoted to serving seniors.

**Background Checks.** We have expanded background checks to confirm the accuracy of statements applicants for our training make on their applications. We believe this is the exception rather than the rule for educational programs.

**Third Party Acknowledgement of the CSA Designation Program.** Departments of Insurance in 46 states award continuing education credit for the program. Our program is also recognized and approved for CE credit by the National Association of State Boards of Accountancy, which upholds certification and continuing education standards for Certified Public Accountants; the Certified Financial Planner Board of Standards, Inc.; the National Continuing Education Review Service of the National Association of Boards of Examiners for Long-Term Care Administrators; and American College PACE recertification.

Summary. SCSA a responsible organization dedicated to serving the public and deserving of the public's trust.

- SCSA does whatever regulators ask of us and even goes beyond that by soliciting regulator input regarding our policies, procedures and members.
- SCSA's curriculum was developed by some of the top people in the field of aging in the country. We teach what we say we're going to teach and test to ensure comprehension. Twenty-two percent of students fail our exam.
- We perform background checks on applicants for our training. These checks, done at the time of application, confirm that an applicant has answered the questions on our disclosure questionnaire honestly.
- We accurately describe what the Certified Senior Advisor (CSA) credential represents and what it does not represent through a disclosure statement and in all materials.
- We have a Code of Professional Responsibility enforced by an independent Board of Standards that disciplines members who violate the Code. We publicly list disciplinary actions.
- We intend to further demonstrate that the public can have confidence in CSAs by becoming accredited by the National Organization of Certifying Agencies.
- Most states, and a number of other organizations, give continuing education credit for our curriculum.
- We comb through state and federal regulatory databases daily to identify any CSAs who have been charged with rules infractions. Regulatory data show few blemishes on the record of CSAs.

- We make our channels of communication available to regulators and find ways for regulators to talk to our members and others who work with seniors about proper practices.
- We invite regulators to attend our course to see for themselves what we teach.
- We request that regulators inform us of any CSAs who they believe are acting in an unethical or unscrupulous manner, or who they have brought actions against.
- We regularly remind CSAs not to present themselves as more than they are and to involve regulators in their activities, such as inviting regulators to any public meetings the CSA may organize.
- We have added three online ethics courses to our curriculum over the past two years.
- We developed a program for CSAs to present to the public on how seniors can avoid financial abuse. State and federal regulators have applauded that initiative.