



THE CSA'S ROLE, RULES AND RESPONSIBILITIES

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The final quiz at the end of this module must be completed with a 100% passing score. The review questions embedded at various places within this module are the same questions that are on the final quiz.

The CSA's Role, Rules and Responsibilities

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Chapter 1

Introduction

As a Certified Senior Advisor (CSA)[®], you are part of a distinguished group of people who represent a wide array of professions—people who have enhanced their ability to use their expertise with their senior clients. CSAs are committed to better serving their senior clients.

This online module covers the *CSA Code of Professional Responsibility*. All CSAs must adhere to the CSA Code and these Rules in their professional interactions. Maintaining the integrity of the CSA certification requires professionals to recognize potential “ethical gray areas” and to consciously make the best possible ethical choice for the situation.

Additionally, it requires CSAs to report behavior of other CSAs to the CSA Board of Standards when they have evidence of a possible violation of the *CSA Code of Professional Responsibility*. By self-monitoring and having an awareness of the behavior of other CSAs, members can use the certification proudly.

The CSA’s Role in Serving Seniors

Becoming a CSA gives professionals who work with seniors an increased understanding and appreciation of the challenges that the majority of seniors in the United States face.

By applying senior-specific knowledge to their own professional skills, CSAs can be of greater service and help to seniors by:

- Communicating better with seniors
- Relating to seniors from a foundation of heightened awareness of seniors’ values, needs and specific issues
- Demonstrating their understanding of the special ethical standards of working with seniors
- Guiding seniors to qualified resources when seniors’ needs are outside their area of functional expertise

As a CSA, you are representing that you have senior-specific knowledge that adds to and complements your expertise as a professional, so that your services are of more value and benefit to seniors. This also means that you agree to refer seniors to qualified professionals who can help them, when the seniors’ needs are outside your area of expertise.

Furthermore, a CSA should encourage both prospective and existing senior clients to practice due diligence in selecting the professionals they want to engage to help them address their needs.

Remember—*having the CSA certification is like speaking a second language*. If you learn Spanish, it doesn't make you qualified to give financial advice, but if you are already qualified to give financial advice and then learn Spanish, you are certainly more valuable to Spanish-speaking clients. The CSA certification is a supplement to your skills and abilities, not a substitute.



Chapter 1 Review Questions

1. CSAs are individuals who have learned how to:
 - a. Get seniors to do what their families think they should do
 - b. Advise seniors on any topic they ask for help on, even if outside the CSA's area of competence
 - c. Better understand and communicate with seniors
 - d. Solve all the social and psychological factors of aging

2. The benefits to seniors of working with CSAs include:
 - a. Discounts on the professional services provided
 - b. Assurance that CSAs have learned about key issues affecting seniors
 - c. Trust that a CSA can advise and solve problems in all areas of the senior's life
 - d. Confidence a CSA works with seniors exclusively

Answers to Chapter 1 Review Questions

1. **C.** Professionals who have senior-specific knowledge can improve their communications with seniors and relate to seniors with greater awareness of seniors' values, needs and specific challenges. In addition, CSAs are able to demonstrate their understanding of the ethical standards of working with seniors. CSAs can also guide seniors to qualified professional resources when seniors' needs are outside their area of functional expertise

2. **B.** CSAs have learned about health, financial and social issues that affect the majority of seniors in the United States.

Chapter 2

The CSA Code of Professional Responsibility

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.

The *CSA Code of Professional Responsibility* has been developed to guide CSAs in their professional actions—and to protect and preserve the credibility that has resulted from the hard work and solid reputation built by many individual CSAs over the years.

In this section, we'll be discussing the five Standards in the *CSA Code of Professional Responsibility* and the Rules that support them. In addition, the Code contains detailed advertising rules and guidelines for using the CSA logo and certification marks, which are covered later in this module.

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)[®] certification. The CSA Board of Standards (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 complaints and disciplines CSAs when appropriate.

For the purposes of the *CSA Code of Professional Responsibility*, a person who is certified to use the certification 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.

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 CSA's Role, Rules And Responsibilities

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.^{1,2}

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.

The five standards in *the CSA Code of Professional Responsibility* are:

1. Competence
2. Honesty
3. Trustworthiness
4. Fairness
5. Professionalism

In addition, the Rules in the Code support the Standards. Both the Standards and Rules 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.



To maximize your learning experience in the following section of this module, each Standard in the *CSA Code of Professional Responsibility* is grouped with its corresponding Rules.

Let's take a look at how each Standard and its supporting Rules apply to being a CSA.

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.

¹See Appendix A to the Code for Advertising Guidelines.

²See Appendix B to the Code for Usage Standards for the CSA Logo and Marks.

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.

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 in the form of CSA CE requirements.

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 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).

Example: *Jack, a CSA, is a licensed life and health insurance agent and a registered investment advisor. He positions himself in his marketing materials as a "Senior Specialist." His goal is to provide "one stop shopping" for his clients. Jack wants his clients to have balanced portfolios for their entire range of needs. To accomplish this, he often recommends long-term care insurance to his clients, as well as the option to own real estate, because he has successfully bought and sold residential and commercial properties over the years.*

Explanation: Jack's professional expertise is in investments and insurance, not buying or selling real estate, regardless of personal success in owning and selling property. In Jack's mind, adding the option of owning real estate to his investment recommendations is part of serving seniors' entire range of needs, but it violates Rules 103 and 104 because he is offering services outside his core competency.

Example: *Margaret is a CSA, a CPA and financial advisor specializing in tax issues that affect retirees. During a particularly busy period, several tax changes that apply to wealth transfer escaped Margaret's notice. As a result, during this period, she provided outdated information and ill-advised strategy suggestions to her clients that ultimately proved costly to them.*

Explanation: While unintentional, by not staying current with the tax changes, and thereby providing unsound advice to her clients, Margaret violated Rule 102 that requires CSAs to 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.

Example: *Paul, a CSA, is the general agent at an insurance agency with several agents who are CSAs. A senior files a complaint with the state's insurance commissioner against two of the agents who are CSAs. If the insurance commission decides the complaint is valid, the CSA Board of Standards may take disciplinary action against the two agents and, depending on the circumstances, Paul.*

Explanation: Under Rule 105 of the CSA Code, Paul is an associated person to the complaint that has been filed with the state insurance commission. As such, his CSA certification may be suspended by the CSA Board of Standards, even though the insurance commission has not yet made a decision.

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.

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 CSA 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.

Example: Robert, a CSA and self-employed financial advisor, markets himself as an independent advisor. He also receives a commission from an annuity company when he converts his clients' assets to the company's new product. Robert informs his senior clients about the total amount of compensation he would receive if they accept his financial recommendations that include the new product, but he does not specify that this total amount includes the commission for selling the company's new annuity product.

Explanation: Robert is misrepresenting himself as an independent advisor and he is not telling his clients he is paid a commission when he sells the company's new annuity product. He is violating the Standard of Honesty, which requires CSAs to tell their clients in writing or in discussion the information that their clients need to fully understand the proposed products or services. In addition, Robert is violating Rule 203, which requires CSAs to fully disclose the terms and conditions associated with their professional advice, services and products. Robert should give clients a detailed compensation breakdown disclosure, including fees and commissions.

Example: Laura, a CSA and financial advisor with a major financial services firm, advertises that she provides professional advice on a full range of retirement income options, including tax planning and asset allocation. In fact, Laura is limited to offering only her company's financial products and services. Laura does not disclose this fact to her clients and, in an effort to increase her sales, implies that the financial solutions she is recommending are suggested or endorsed by AARP.

Explanation: Laura is obviously violating Rule 203 by not telling her clients that she is limited to selling her company's financial products, and by implying that AARP suggests or endorses those products. It would also be considered a violation if her company's products do not address a full range of retirement income issues. Rule 203 forbids a CSA from providing professional advice, services, or products through dishonesty, fraud, deceit or misrepresentation, either directly or by omission; and forbids the CSA to make false or misleading statements to any person or entity.

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.

Rules that Relate to the Standard of Trustworthiness

Rule 301. Prior to establishing a professional relationship, a CSA may, upon request, provide to a prospective client 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 licenses, credentials, or qualifications.

The CSA's Role, Rules And Responsibilities

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.

Example: *Jim, a CSA and life and financial advisor, has worked with his senior client Bob, for a number of years. Recently, Bob has become difficult to deal with and, in Jim's opinion, is taking too much time asking questions about things he should know after so many years. As a result, Jim has begun to find ways to reduce the amount of direct interaction he has with Bob. Jim has told his secretary to return Bob's calls and get Bob's questions in writing, so Jim can use e-mails to answer Bob's questions, rather than calling him back in person.*

Explanation: Getting client information in writing and documenting the client's responses in writing can be an excellent way to avoid confusion and potential liability, but Jim's biggest mistake is not continuing the direct interaction with Bob.

By consistently having his secretary interact with Bob, Jim is violating Rule 305, because there is ample opportunity in this method of responding to a client for Bob's questions to be misunderstood or misinterpreted. Also, this method does not provide Jim the "real time" communication he should have to ensure that Bob understands the terms and consequences of his financial decisions. Jim's actions are clearly not in Bob's best interests, which also violates Rule 306.

Example: *Norma, a CSA, is acting as a registered representative with discretionary trading authority. She enjoys the trust of her senior clients and meets with them regularly to review their investment portfolios. Because her practice is growing quickly, she does not always have time to call her clients when she wishes to make changes to their portfolios. She knows that they would never complain because of their relationship with her; and she informs them later.*

Explanation: Norma is not in violation of securities laws because she is a registered representative with discretionary trading authority. However, as a CSA, Norma would be violating Rule 302, which requires client approval and authorization of all products and services prior to their delivery; and possibly Rule 303, which requires a CSA to provide services in a timely manner.

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.

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 Web site, 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 clients' 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 and Rules of this Code.

Example: *John, a CSA and long-term care insurance agent, formed a network with other local advisors in different professions who concentrate on the senior market. As part of a group effort to produce a new marketing "package" of services to better serve seniors, John provides the other advisors in his network with information he's gleaned over the years about each client's personality, likes and dislikes, hobbies and interests, family members, and how each one typically behaves when making a decision. John makes it clear to the others that this information is personal and not related to his client's financial matters or decisions.*

Explanation: John has violated Rule 402 because he did not safeguard his clients'

personal information. Personal information that may be incidental to a business relationship with clients is still covered under Rule 402.

Example: *Nancy is a CSA and financial advisor. One of her successful clients, George, referred his son Nick to her. Nick hires Nancy, and opts for a more high-risk financial strategy than his father. When George meets with Nancy to review his own portfolio, he mentions he's pleased Nick chose to work with her, as it sounds like his investment strategy is working for him. Nancy replies that she enjoys working with him and appreciates George's confidence.*

Explanation: Nancy is not violating confidentiality rules by using a general statement that she enjoys working with Nick. Thanking someone for a referral is always a good idea. She would be violating confidentiality rules and her fiduciary duties if she revealed details about Nick's investments, even to a family member.

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.

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 recertification fees and fulfilling any ongoing Certification Council 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 CSA 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 who has not renewed his or her recertification, 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.

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 the 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 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 that he or she is the subject of a complaint cannot relinquish the CSA certification to avoid disciplinary action.

Example: *Amy is a long-term care insurance agent, and was also a CSA until she allowed her certification to lapse several years ago. However, she continues to indicate in her advertising and interactions with prospects and clients that she is a CSA in good standing.*

Explanation: Amy did not renew her certification. Therefore, she is no longer entitled to use the mark or logo of a CSA. She is in violation of Rule 503.

Example: *In his CSA renewal application, Phil did not reveal that two months ago he became subject to a disciplinary hearing by his employer for failing to disclose his interest in a reverse mortgage sales group being charged with making fraudulent claims, and that this investigation is ongoing.*

Explanation: The CSA Office of Recertification reviews all renewal applications and would very probably catch Phil's failure to report the disciplinary hearing. The Office of Certification would then likely not renew Phil's certification, because Phil has violated Rule 509, which requires CSAs to inform the Office of Certification of a disciplinary proceeding involving the CSA, directly or indirectly, in an accurate and complete manner, within 30 days of the CSA receiving that notification. Phil is also in violation of Rule 504 that requires CSAs to avoid business conduct that reflects adversely on their integrity or on the CSA Certification Council or Office of Certification. Although the Office of Certification might catch the omission, Phil is ethically still obligated to report the ongoing investigation.

Example: *Barbara, a CSA and financial advisor, suspects that her longstanding client, Harry, is showing possible early signs of dementia, and if so, will at some point in the future have a diminished capacity to continue managing his affairs properly. Barbara is concerned that if she does not retain Harry as a client, it may open the door to potential abuse by a less scrupulous advisor. But she also wants to protect herself professionally and ethically. She asks Harry for his written permission to consult with his attorney regarding his financial affairs and decisions, in order to protect his best interests, which Harry provides.*

Explanation: At this point in time, Barbara has come up with an appropriate ethical solution to a difficult situation that is covered by Rule 507, which requires CSAs to carefully determine, within their field of expertise, a prospect or client's financial or medical status

before providing professional advice or services. However, a caution: if a client is clearly of questionable competence, then a written agreement or letter from the client to involve other advisors is not good enough, because judging competency is a legal decision made by a court and gets into legal areas such as powers of attorney. If Harry is showing signs that he may have developed severe dementia, Barbara should notify Harry's attorney that she is unable to advise Harry because of possible competency issues, and request proper medical or other authorities to certify Harry's competence to authorize Barbara and his other advisors to work together to make decisions. It would also require involvement from Harry's immediate family, if any.



Chapter 2 Review Questions

1. Once individuals earn the CSA certification, they:
 - a. Need only comply with the *CSA Code of Professional Responsibility*, regardless of other professional rules or state/federal laws and regulations
 - b. May charge fees based solely on the basis of the CSA certification
 - c. Must maintain or enhance their competency as a result of changes to legal, regulatory and professional standards and processes
 - d. May perform any professional service requested by a senior

2. CSA's comply with both the letter and the intent of the standard on Honesty if they:
 - a. Use only the technical and legal language required to describe products or services when more common every-day language makes the risk to the senior look too great
 - b. Convey to clients verbally and in all business materials what their profession is, along with their professional licenses and credentials
 - c. State they are representing the views of the CSA Certification Council or the CSA Office of Certification.
 - d. Solicit clients through advertising that contains statements that are true in some circumstances

3. The Standard of Fairness says that CSAs, in their professional interactions and conduct:
 - a. Should never provide references and recommendations from present or former clients, even if these clients have given permission to do so and signed a release
 - b. Can deliver a product or service without the disclosure of existing or potential conflicts of interest
 - c. Are required to apply the Code's rules only to interactions with senior clients, but not with employers or non-senior clients
 - d. Should be certain their clients fully understand the terms of a particular product or service

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4. In serving senior clients, CSAs:
 - a. Are required to inform clients of changes in their professional licenses and other credentials
 - b. Must never disclose a client's confidential information, even if legally required to do so
 - c. Are allowed to treat clients, prospects and others with different levels of service based on the size of their accounts or other business considerations
 - d. Must safeguard and keep confidential only a client's business information, but not incidental, relationship matters

 5. To observe the standard of Professionalism, CSAs:
 - a. Do not report the known misconduct of another CSA because of the confidentiality issues involved
 - b. Must refrain from denigrating other professions or professionals
 - c. Do not hold subordinates who are not CSAs to the same standard of service as that required of the CSA
 - d. Must exercise due diligence and good faith only in transactions involving just senior clients, but not non-senior clients

 6. CSAs have the obligation to disclose to a client:
 - a. All existing, potential, or perceived conflicts of interest
 - b. Their score on the CSA exam
 - c. The names of all the CSA's business partners
 - d. The month and year the CSA earned the CSA certification

Answers to Chapter 2 Review Questions

1. **C.** CSAs have an obligation to keep their professional training, skills and knowledge current and comprehensive in order to competently provide professional services to clients.
2. **B.** CSAs shall accurately and completely convey to clients and potential clients, whether presented verbally or on business materials, their true professions and active professional licenses or credentials.
3. **D.** CSAs shall confirm that their senior clients fully understand the terms and risks of a particular product or service.

The CSA's Role, Rules And Responsibilities

4. **A.** In providing professional advice and services to clients, a CSA must disclose to them any changes to the CSA's professional credentials, qualifications and licenses.
5. **B.** CSAs shall apply fairness and integrity to their 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.
6. **A.** The standard of Fairness requires that CSAs disclose all potential or perceived conflicts of interest that may arise in connection with providing professional services to clients, prospects and business associates.

Chapter 3

The Disciplinary Procedures

The CSA Board of Standards

The CSA Board of Standards, Inc. (the “Board”), an independent, non-profit 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 imposing any sanctions on CSAs as a result of complaint case review. 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 at the direction of the Board, with ratification by the Certification Council, suspends a CSA’s right to use the certification 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 which 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 CSA 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 initial review of the case.

Complaints should be sent to the Board via:

Facsimile at: 303-758-8747
Email at: complaints@csa-bos.org
Or mailed to: CSA Board of Standards
820 S. Monaco Pkwy. #338
Denver CO 80224

Within 7 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 CSA response is received, a case review is scheduled for the next BOS 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.

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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:

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.

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.

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.

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.

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 CSA's 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)[®] certification 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.



Chapter 3 Questions for Review

1. An administrative suspension of a CSA by the CSA Board of Standards:
 - a. Is routinely issued by the Board upon receiving any complaint against the CSA
 - b. Permanently revokes the CSA's right to use the certification
 - c. Cannot be put in place until the CSA has been notified that he or she has been named as the subject of a complaint by a governmental, regulatory or administrative body
 - d. May be imposed prior to formal review by the CSA Board if a governmental, regulatory, or administrative body has named the CSA in a complaint or investigation

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2. In addressing complaints against a CSA, the CSA Board of Standards may:
 - a. Impose public censure if a CSA is found to have violated the CSA Code of Professional Responsibility
 - b. Not notify the CSA he or she is the subject of a complaint until after the Board has reached a final decision about it
 - c. Impose a fine on the CSA
 - d. Not enlist the help other CSAs to assist in an investigation

 3. A complaint against a CSA can:
 - a. Be submitted via telephone
 - b. Be anonymous if the complainant fears retribution
 - c. Originate from the public, another CSA, a state or federal regulatory agency or body, or the CSA Office of Certification.
 - d. Be submitted to the President of SCSA for action, at the complainant's discretion

Answers to Chapter 3 Review Questions

1. **D.** The CSA Board of Standards may impose an administrative suspension without prior notice to the CSA when that CSA is named in an investigation or complaint by a governmental, regulatory, or administrative body.
2. **A.** Public censure of a CSA is one of a range of sanction options available to the CSA Board.
3. **C.** Complaints can originate from the public, another CSA, a state or federal regulatory agency or body, or the CSA Office of Certification.

Chapter 4

Appendix A to CSA Code: Advertising Rules for CSAs

Advertising Guidelines

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

Example: *The marketing director of a financial services firm that has several CSAs on staff places a recurring ad in the business section of the local newspaper, next to a weekly column that spotlights products and services of interest to seniors. In the ad, the firm promotes itself as having "Certified Senior Advisors available to assist seniors with all their financial and estate planning needs."*

Question: Why is this advertising approach not correct?

Answer: The ad . . .

- Does not refer to one or more specific CSAs.
- Does not list current contact information for the CSAs.

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.

Example: *Jim Johnson indicates on his business cards and brochures that he is a "member of the Society of Certified Senior Advisors." Because he decided to refer to himself as an SCSA member, he used SCSA's logo to strengthen his credibility.*

Question: What did Jim do wrong?

Answer: It is incorrect to say "member of the ..." To be correct, Jim can show his name in one of the following ways:

- Jim Johnson, CSA
- Jim Johnson, Certified Senior Advisor (CSA)[®]
- Jim Johnson, Certified Senior Advisor[®]
- CSAs are not allowed to use SCSA's corporate logo. Jim should have used the CSA member logo on his business card. (See Appendix B of the Code for detailed examples of logo usage.)

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 they are 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 CSA 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.

Example: *Sally, a new CSA, is offering a free seminar at a senior center to promote her investment planning practice. She posts and sends out flyers that give information on the estate planning vehicles she provides. The flyers indicate participants “can’t lose” with these vehicles and they are “guaranteed winners.” In the flyers, Sally also indicates her affiliation with AARP, hoping to give the impression that AARP endorses her.*

Question: Where did Sally go wrong?

Answer: It is clearly misleading and deceptive for Sally to use phrases or descriptions to promote investment products that directly or indirectly imply investors “can’t lose” and will be “guaranteed winners.” It is also a violation of the advertising rules to imply she has an endorsement from AARP.

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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.

Example: *Jerry, a CSA, is also a CPA. Tax season is fast approaching, and to increase business, Jerry creates new advertising. In these ads, he promotes a list of mistakes he claims a tax service that hires seasonal accountants makes, versus having tax returns prepared by a seasoned professional such as himself.*

Question: What's wrong with Jerry's approach?

Answer: It is wrong for Jerry to disparage another tax preparation service by making claims about their mistakes compared to his services.

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.

Example: A new estate tax law received a lot of media coverage, causing confusion for many seniors. Mike, a CSA and licensed insurance agent, created a free seminar with a qualified investment advisor as a speaker to answer seniors' questions and offer them ideas for how to adjust their investment strategies to avoid penalties. The promotion for the event did not mention that all participants would receive a follow-up call from Mike on various insurance options.

Question: What's wrong with Mike's strategy?

Answer: Obviously, the underlying main purpose of the seminar is to generate sales leads for Mike. His advertising was wrong because it did not disclose the true nature of the seminar and that all participants would receive a follow up sales call from him. In addition, even though Mike has obtained a qualified speaker for the seminar, Mike must exercise great care when promoting insurance as an investment option. He is not securities-licensed, nor is he a registered investment advisor, so to hold himself out as qualified to give investment advice is potentially deceptive and inaccurate.

6. **Disclosure Statement.** The CSA 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 in 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

All CSAs are required to use this 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.

This 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 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.



Chapter 4 Review Questions

1. When designing advertisements, CSAs should ensure that the:
 - a. Advertisement does not reveal that a product or service is being sold
 - b. Society of Certified Senior Advisors logo is clearly displayed in the advertisement
 - c. Advertisement reveals the true nature of the product or service promoted
 - d. Words “no risk” or “completely safe” are clearly displayed when the advertisement is for an investment opportunity

2. The following element may be omitted from a CSA’s advertisement:
 - a. Name
 - b. Web site
 - c. Telephone number
 - d. Business address

Answers to Chapter 4 Review Questions

1. **C.** Advertisements must reveal the true nature of the product or service being promoted.
2. **B.** Only the CSA’s web site address is not required to be shown in the advertisement.

Chapter 5

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

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)[®]. 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 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)[®]
- Certified Senior Advisor[®]
- The CSA logo, which appears directly below:



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

I. Basic Rules for the CSA Certification and Marks

- a. All CSAs acknowledge and agree that the CSA 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.

| Correct Use | Incorrect Use |
|---|---|
| John I. Jones, CSA | Jones & Co., CSAs |
| Joan I. Jones, Certified Senior Advisor (CSA) [®] | Jones & Co., Certified Senior Advisors (CSA) [®] |
|  |  |

Guideline 2. The [®] symbol should be used properly when they appear with the certification and/or marks.

| Correct Use | Incorrect Use |
|--|--|
| 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 |
|-------------|---------------|
|-------------|---------------|

The CSA's Role, Rules And Responsibilities

| | |
|---|---|
|  John I. Jones, CSA |  John I. Jones, CSA |
|---|---|

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 |
|--|---|
| John A. Johnson, CSA  <i>STRAIGHT LINE</i> <i>FINANCIAL SERVICES</i> | John A. Johnson, CSA <i>STRAIGHT LINE</i> <i>FINANCIAL SERVICES</i>  |

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

| Correct Use | Incorrect Use |
|---|--|
| John A. Johnson, CSA  |  <i>John A. Johnson</i> Certified Senior Advisor (CSA)  John A. Johnson, CSA Certified Senior Advisor (CSA) |

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

| Correct Appearance | Incorrect Appearance |
|---|---|
| John A. Johnson, CSA  | John A. Johnson, CSA  |

Color Specifications for the CSA Logo

The CSA Office of Certification sends to newly-designated CSAs a “Welcome Packet,” which contains information 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 is improper use.

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



Chapter 5 Review Questions

1. Those authorized to use the CSA logo and marks:
 - a. Are CSAs in good standing
 - b. Have let their CSA recertification payment lapse.
 - c. Are students who will complete their CSA certification training within 30 days
 - d. Are any individuals who have ever earned the CSA certification

2. When using the CSA certification marks, CSAs acknowledge and agree:
 - a. To conduct themselves and their businesses in a manner that does not cast unfavorable light over the CSA certification
 - b. That the individual CSA solely owns the rights, title, and interest in the certification rather than the CSA Certification Council.
 - c. The marks may be used by a company, as long as all employees in the company are CSAs
 - d. The guidelines apply to printed material only

Answers to Chapter 5 Review Questions

1. **A.** CSAs who are in good standing are the only individuals authorized to use the CSA logo and marks. CSAs in good standing have met 1) all the requirements to earn the certification; 2) all financial commitments the CSA Office of Certification; 3) all CSA CE requirements; and 4) they have not had their certification revoked or suspended.
2. **A.** 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.

Chapter 6

The CSA Board of Standards, CSA Certification Council and CSA Office of Certification

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.

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.

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.

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.

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.

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)[®] 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:

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

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.

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:

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- **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.

Chapter 7

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
 - 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

The CSA's Role, Rules And Responsibilities

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)[®] 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)[®] 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.



Chapter 6 and 7 Review Questions

1. The CSA CE recertification requirements for all CSAs state that:
 - a. CSAs must take *only* CSA CE ethics courses to fulfill their CSA CE requirements
 - b. CE courses offered by approved CE providers qualify for CSA CE credit
 - c. CSAs must earn 12 credits in ethics every three years
 - d. Volunteering for senior organizations will *not* earn CSA CE credit

2. The CSA Office of Certification may withhold the CSA certification from an applicant if he or she:
 - a. Does not have a college degree
 - b. Was not referred by another CSA
 - c. Failed to complete the *CSA Code of Professional Responsibility* online module
 - d. Failed to pass the CSA exam on the first attempt

3. The three year recertification of a CSA:
 - a. Can be declined by the CSA Board of Standards during its regular review of renewals
 - b. Can be approved even if the CSA is under suspension
 - c. Depends solely on the CSA paying the annual renewal fee
 - d. Must be done on time or else the CSA faces the possibility of additional requirements to reinstate.

4. Individuals who have let their CSA certification lapse *for more than 12 months* and want to become certified once again should know that they:
 - a. Must only pay a certification fee
 - b. Must re-take and pass the CSA exam
 - c. Can continue to use their original certification date if their request is approved
 - d. Only need to show proof of volunteering with seniors

5. CSAs must understand and agree to this Term of Certification:
 - a. CSAs are permitted to use the mark Certified Senior Advisor (CSA)[®] as long as they are in good standing and continue to meet renewal and recertification requirements

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- b. The CSA Office of Certification cannot suspend or revoke the CSA certification for nonpayment of fees.
 - c. CSAs must complete CSA Continuing Education (CSA CE) credits every year.
 - d. The CSA Office of Certification, rather than the CSA Board of Standards, has the authority to revoke the CSA certification if it finds a CSA failed to comply with the CSA Code of Professional Responsibility.

Answers to Chapter 6 and 7 Review Questions

1. **B.** CE courses offered by CE providers that have been approved the CSA Office of Certification qualify for CSA CE credit. This includes courses taken to renew state or professional licenses and credentials, as long as they are cover ethics or are directly related to seniors; sales and marketing courses are not eligible for CSA CE credit
2. **C.** One of the requirements to become certified is to complete the online module entitled *The CSA's Role, Rules and Responsibilities*, which covers the *CSA Code of Professional Responsibility*. Candidates who pass this test, and meet all other certification requirements, are awarded the CSA certification.
3. **D.** To renew certification, a CSA must pay the required fee and sign the attestation statement, which includes mandatory disclosure questions. Individuals that let their certification lapse for **less than 12 months** may reinstate. Reinstatement does not require a person to re-pass the CSA exam. However, **more than 12 months'** lapse in certification, does require a person to re-pass the exam.
4. **B.** Individuals who let their certification lapse for more than 12 months and wish to become certified once again must re-take and pass the CSA exam, pay a recertification fee, meet current certification requirements, and complete the recertification form that has mandatory disclosure questions. The CSA Office of Certification reserves the right to conduct a background check as it deems may be necessary.
5. **A.** CSAs are permitted to use the mark Certified Senior Advisor (CSA)[®] as long they are in good standing and continue to meet renewal and recertification requirements.

Course Summary

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.

Remember that a great deal of trust is being placed in you by SCSA, seniors, CSAs, your professional colleagues and others to always conduct yourself and your business according to high ethical standards.

With your CSA certification, you have an opportunity to demonstrate the difference that specialized knowledge about seniors makes—because you are that difference. You can add value to your interactions with your senior clients and their adult children in ways that make their lives better.

When all is said and done, it is this kind of difference that may have the greatest meaning to them, and to you. Integrity and values in action are the foundation of the CSA certification—and you are part of this foundation.