



NEHA Certificate Program Policies & Procedures



NATIONAL ENVIRONMENTAL HEALTH ASSOCIATION
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Advisory Group Composition and Responsibilities

Policy: The Advisory Group for a NEHA Certificate Program is responsible for understanding the Certificate Program; advising management on issues integral to ensuring the certificate program remains current, relevant, and valuable to the program's stakeholders; reviewing changes to the certificate program and its policies and procedures; and reviewing the annual program evaluation.

Purpose: To clarify the roles and responsibilities of a NEHA Certificate Program Advisory Group member.

Procedure:

- The role of the NEHA Certificate Program Advisory Group is to ensure a fair, professional Certificate Program. This can only be accomplished by maintaining standardized policies and procedures equitable to all participants.
- The Advisory Group advises on the development and implementation of the Certificate Program. This may include review of the Certificate Program Plan, the Certificate Program Handbook, Certificate Program Instructional Design Plan, the assessment instrument and item performance, and/or the Certificate Program Policies and Procedures, plus any other documents that the EZ Certificate Program Management might deem necessary to fully understand the program and their duties.
- The Advisory Group meets at least annually to discuss current practices and proposed changes to the Program, including any updated federal, state, and/or local laws.
- The Advisory Group reviews Certificate Program patterns and trends from the Self-evaluation of Learning and Training, patterns and trends from the summative assessment scores and items, results of the internal audit, the program evaluation, and the management review and meeting notes, at least annually, to ensure that the course stays current, relevant, and valuable to its primary stakeholders.
- As part of the regulatory, environmental health education, and industry communities, the Advisory Group discusses the value of Certificate courses from their own experiences within their communities.
- All updates/revisions to the NEHA Certificate Program are discussed with the Advisory Group at least annually. Opportunities for questions and discussions are provided, and those Committee members not in agreement with the change(s) and/or update(s) can express their reasoning. Minor changes in dates, grammar, and spelling do not need to be discussed.
- Information on updates/revisions to federal, state, and/or local jurisdictional laws, or to the Program itself, are distributed via email to all Committee members prior to the annual meeting to give them time to read the information.

- Should there be an immediate change needed in any of the Certificate Programs, an email is sent to all Committee members with details of the change(s) with a request for input. No response is taken as a tacit agreement to the change.
- Members of the Advisory Group are suggested by staff in EZ and by the current Committee. Members cannot present a conflict of interest to the Certificate Programs and must abide by all policies and procedures of the Program.
- The Advisory Group, to be fair and just, should represent the interests of all pertinent stakeholder groups. These stakeholder groups are initially determined by the Certificate Program Management, but the Advisory Group will help in determining who is a stakeholder so that they have a representation on the Advisory Group. Current known stakeholders include regulatory personnel from various regions of the country, industry, trainers, content developers, and NEHA members and staff.
- The Advisory Group will serve a 4-year term in conjunction with the issuance of the FDA *Food Code*. Committee members will have the opportunity to remain on the committee for a second term of service provided there are no objections from other committee members. If a Committee Member decides not to continue after the 4-year term, or becomes unable to participate for whatever reason, new members will be selected based on needs by the Certificate Program Manager, Certificate Program Administrator, and outgoing Advisory Group Members (if available).

Certificate Program Instructional Design Plan, Development, and Delivery

Policy: A NEHA Certificate course is designed and delivered by qualified personnel following training and education industry generally accepted practices for instructional design and adult learning.

Purpose: To illustrate how a NEHA Certificate course is designed and delivered by qualified personnel following training and education industry generally accepted practices for instructional design and adult learning.

Procedure:

- NEHA Certificate Program courses follow the ADDIE (Analyze, Design, Develop, Implement, and Evaluate) model of instructional design.
- Based on a needs assessment, the program's purpose, scope, and sequence are created. Learning objectives are then created based on the needs assessment, and the summative assessment is matched to those objectives. An outline for the course/curriculum is then designed to ensure necessary knowledge is imparted with additional respect to the weighted needs for skills or knowledge. The course outline is then developed into a full text version. Research for course material and supporting documents is conducted at all levels of course development through implementation of the materials.
- Some Certificate Program courses are divided into modules. At the end of each module is a content-based formative assessment. Passing this formative assessment is required to move

forward to the next section. If a participant misses a question, they are sent back to the body of text to review and attempt the question again.

- Each NEHA course undergoes numerous internal evaluation reviews within the Education Section in the EZ Department. Until the point of printing, the material is subject to edits and rewrites if new information or updated regulations become available.
- Course design is overseen by the NEHA instructional design team.
- NEHA Trainers who deliver the Certificate courses must hold certain certifications and/or have a level of education as specified in the course handbook.

The ADDIE model is widely used as an industry standard as described in these reference materials:

1. Dick, W., & Carey, L. (1996). *The Systematic Design of Instruction* (4th Ed.). New York: Harper Collins College Publishers.
2. Leshin, C. B., Pollock, J., & Reigeluth, C. M. (1992). *Instructional Design Strategies and Tactics*. Englewood Cliffs, NJ: Education Technology Publications.
3. Branch, R. M. (2009). *Instructional design: The ADDIE approach* (Vol. 722). Springer Science & Business Media.

Certificate Issuance and Use

Policy: A NEHA Certificate will be issued upon successful completion of the NEHA Certificate course pertaining to that specific Certificate.

Purpose: To clarify the process for obtaining a NEHA Certificate

Procedure:

- All requirements are fulfilled by the learner and verified by the Certificate Program Administrator. The EZ department uses only the information gathered during the Certificate Program process as a basis for the decision to issue the Certificate.
- Issuance Authority – NEHA’s Entrepreneurial Zone (EZ) issues all Certificates in a responsible manner and informs Certificate holders and stakeholders about proper use and interpretation of the Certificates issued. The EZ team develops all criteria for Certificate issuance and is the sole authority for issuance of all NEHA Certificates (i.e., NEHA does not outsource this decision).
- Certificate Requisites - Certificates are issued after all requisites are fulfilled by the learner and verified by the EZ Department. Successful completion of a NEHA Certificate course may be determined by course seat time, as well as a passing score on the course summative assessment, as described in the course-specific Certificate Program handbooks. Seat time is defined as “the minimum amount of time needed to fully meet the learning outcomes.”
- Non-Transferable - NEHA Certificates are only issued to individuals and are non-transferrable.
- The EZ Department uses only the information gathered during the Certificate Program process as a basis for the decision to issue the certificate.

- Term of validity – The NEHA Certificate will be valid for a period as defined in the course specific handbook, allowing time for course adjustments. Local jurisdictional requirements may differ and will then supersede NEHA’s term.
- Issuance – In an instructor-led course, Certificates will be signed by the instructor and issued to a participant after the course requisites have been met. In an online course, Certificates are available to download and print following successful completion of the course and a passing score on the summative assessment.
 - The Certificate of Completion bears the participant’s name and date of completion of the selected Certificate Program course.
- Details on a Certificate - NEHA Certificates from an instructor-led course are signed by the NEHA-approved instructor. NEHA Certificates from an online course contain a secure Quick Response (QR) code that ensures the name on the certificate matches the name on file at NEHA.
- All Certificates include:
 - Name of the Certificate holder
 - Title of the Certificate program
 - NEHA (and affiliates if applicable) name and logo
 - Certificate issue date
 - Term of validity (when applicable)
- Invalidating a Certificate – The Certificate Program Administrator shall notify Certificate holders in writing, if a previously issued Certificate is invalidated. NEHA Certificates are invalidated for the following reasons:
 - Determination is made that a certificate holder did not participate in the required course and/or successfully complete the summative assessment.
 - Determination is made that a certificate holder received the certificate by administrative or technical error.
- Designations - NEHA does not grant designations or designation acronyms to Certificate holders.
- Continuing Education – Certificate holders do not need continuing education to maintain their standing as a NEHA Certificate Holder.
- Complaints/Questions – Any questions or issues regarding the NEHA Certificate Issuance and Use policy can be forwarded to: support@neha.org.
- Certificate Information – The EZ Certificate Program Administrator should be contacted by phone (303-802-2147) or email (support@neha.org) for information regarding confirmation of Certificate completion, term of validity, Certificate date of issuance. The Certificate Program Administrator will reply to all requests within 5 business days.

Invalidating a Certificate

Policy: The EZ Certificate Program Administrator shall notify Certificate holders in writing, if a previously issued Certificate is invalidated.

Purpose: To clarify the process for invalidating a NEHA Certificate

Procedure:

- NEHA Certificates are invalidated for the following reasons:
 - Determination is made that a Certificate holder did not participate in the required course and/or summative assessment.
 - Determination is made that a Certificate holder received the Certificate by administrative or technical error.

Jurisdictional Requirements

Policy: It is the policy of NEHA to monitor jurisdictional requirements and update the Certificate Programs as required.

Purpose: To ensure NEHA Certificate Programs meet or exceed all jurisdictional requirements.

Procedure:

- Each state, and the corresponding counties and cities within that state, are responsible for contacting NEHA with updates.
- Any changes in food safety laws or regulations, Certificate acceptance, and/or terms must be entered into the appropriate folder(s) in NEHA's files.
- Any changes / updates that are recommended by the Advisory Group will be noted into the appropriate Certificate Program by the Certificate Program Administrator.
- EZ Certificate Program Administrator is responsible for updating jurisdictional requirements in NEHA's files.

Complaints and Appeals

Policy: A review and appeals process is available to individuals seeking an amendment of a decision denying a Certificate from a NEHA Certificate Program. The EZ Associate Director, Education and the Advisory Group conduct review and appeals processes. The decision of the EZ Associate Director, Education, with input from the Advisory Group, is final. Failure of a NEHA Certificate summative assessment is not subject for an appeal.

Purpose: To outline the complaint and appeal process.

A "complaint" is defined as a cause or reason for dissatisfaction, a grievance.

An "appeal" is defined as a resort to a higher authority or greater power, as for sanction, corroboration, or a decision.

Procedure:

1. Written Complaints and Appeals - All complaints and appeals shall be submitted, in writing, to support@neha.org. The appropriate personnel assigned to monitor all complaints and appeals is not involved in the resolution determination process. EZ's Associate Director, Education, with recommendations from the Advisory Group, is responsible for final determination of complaints and appeals.
2. Submission - These complaints and appeals shall be forwarded to the appropriate personnel assigned to monitor all complaints and appeals. This individual will conduct the appropriate review of the entry and elevate the issue, accordingly.
3. Review – The appropriate personnel assigned to monitor all complaints and appeals (if applicable) will then send the information to the EZ Associate Director, Education. The final determination of the complaint and/or appeal is up to the EZ Associate Director, Education after input from the Advisory Group.
4. Tolerance - Complaints and appeals are resolved in an unbiased and timely manner.
5. Duration - Complaints and appeals shall be reviewed within five (5) business days from receipt of written complaint, and recommendations for action are submitted to the Advisory Group within ten (10) business days from receipt.
6. Final Determination – Final determination and notification are made by the EZ Associate Director, Education, with input from the Advisory Group, within fifteen (15) business days from receipt; 30 days total.
7. All complaints, appeals, and resultant actions will be recorded in the Corrective and Preventive Actions Log.

Privacy, Confidentiality, and Security

Policy: NEHA makes all reasonable efforts to the extent possible to respect and maintain the privacy of Certificate Program participants.

Purpose: To demonstrate our firm commitment to privacy. The following discloses our information gathering and dissemination practices. NEHA reserves the right to change this policy at any time by notifying users of the existence of a new privacy statement.

Procedure:

Confidentiality

NEHA holds in confidence and handles in a secure manner any information of a confidential nature related to, or obtained from, its Certificate Programs. Such information includes:

- Participants (e.g., learners and Certificate holders)
- Learning outcomes evaluation instruments (i.e., assessments)
- Answer keys
- Results
- Other related educational materials

NEHA ensures personal information is not to be disclosed without the explicit permission of the person concerned, strict personal information security is maintained, and proper safeguards are in place to protect against unauthorized disclosure of information.

Security

NEHA implements information security best business practices (e.g., access controls, encryption, etc.) to protect the confidentiality, integrity, and availability of information of a confidential nature.

Collection of Data

NEHA does not collect personal data about individuals except when such individuals or stakeholders specifically provide such information on a voluntary basis. Certificate holders and stakeholders need to be aware that non-personal information and data may be automatically collected through the standard operation of NEHA's internet servers or through the use of 'cookies.'

Purpose of Processing

The personal data collected is used by NEHA and third parties acting on its behalf for customer administration and marketing related purposes including to provide resources to and manage NEHA's relationship with all stakeholders, to process and respond to queries received from the public, and to send marketing communications on NEHA's behalf and on behalf of other selected vendors.

In some cases, such as the program registration, NEHA requires the collection of home address and telephone numbers. It has been NEHA's experience that residential contact information is more constant than business contact information because of the mobility of professionals through their careers. This information is used to contact individuals about upcoming certificate program and awareness information as well as the distribution of certificates.

NEHA occasionally performs statistical analyses of user behavior and characteristics to measure interest in and use of the various areas of the website. NEHA provides only aggregated data from analyses to affiliated third parties.

NEHA also uses an IP address to help diagnose problems with its servers and to administer the website.

As NEHA is an organization based in the United States, some personal data will be collected and processed in the United States by NEHA and third parties acting on its behalf in accordance with and for the purposes set out in this Privacy Policy. Those not wishing personal data to be handled in this way, should inform NEHA using the contact details listed in this document.

Individual Rights

NEHA is a certificate-issuing organization and maintains information on those who possess its certificates or have expressed an interest in them. Those wishing to see the information NEHA retains about them should write to the address in this document.

For those who do not maintain their certificate, NEHA retains certificate records for a minimum of seven (7) years per NEHA standards. Additionally, at an individual's written request NEHA will update/correct personal information previously acquired which he or she believe to be inaccurate.

Requests may be sent to:

NEHA Entrepreneurial Zone
Attn: Certificate Program Administrator
720 South Colorado Blvd., Ste. 105A
Denver, CO 80246

Opt in and Opt out

NEHA is a certificate-issuing organization and, as such, must maintain contact information on all inquiries to communicate relational or transactional information. NEHA also sends promotional material promoting its conferences, awareness opportunities, or other offerings. From time to time, NEHA collaborates with other environmental health related organizations and companies to promote other programs that may be of interest. In such cases, NEHA does not provide these organizations with any mailing information or otherwise disclose any contact information but distributes the organization's information on their behalf to those who have elected to receive such information. If at any time, individuals do not wish to receive marketing material, every marketing e-mail will include an opt-out link at the bottom, or the individual may notify NEHA in writing at the address in this document.

Third Parties

Occasionally, NEHA outsources administration and other NEHA functions to contractors. In such cases, NEHA may provide these third parties with contact information for the sole purpose of performing NEHA-sanctioned tasks under the supervision of NEHA employees. These contractual relationships specifically address the way they may use contact information and that they may not copy or disseminate that information or use it for any purpose other than that specified in the contract. Additionally, upon termination of the contract, they must return all information to NEHA and destroy any copies that they might possess.

Certificate Verification

As an organization that issues certificates, NEHA may be requested to verify whether an individual's assertion that they possess our certificate is accurate. It is an implied duty that NEHA identifies and attests to the certificate holder status of those individuals who do possess our certificates. As such, NEHA will verify whether an individual holds a certificate issued by NEHA or not upon receiving sufficient identifying information regarding the subject of the inquiry. However, under no circumstances is any contact or other information disclosed.

URL Links

NEHA's website contains links to other sites. NEHA is not responsible for any actions or policies of such third parties. Users should check the applicable privacy policy of such a party when providing personally identifiable information.

Signatures

Signatures from all staff, trainers, Advisory Group members, and any contractors or subcontractors associated with the Certificate Program are required on the Affidavit of Nondisclosure and Confidentiality for NEHA Certificate Programs.

Contact us to make comments on this Privacy Policy at support@neha.org, or mailing to NEHA, 720 South Colorado Blvd., Ste. 105A Denver, CO 80246.

Program Commercial Support and Disclosure

Policy: A NEHA Certificate Program will only accept commercial support from a business that supports NEHA's mission, and is, itself, dedicated to environmental health and safety.

Purpose: To characterize commercial support for NEHA Certificate Programs.

Procedure:

- NEHA will not actively seek out commercial support for its Certificate Programs.
- Should a business entity contact NEHA with a desire to provide commercial support of any one, multiple, or all NEHA's Certificate Programs, that business must provide:
 - A written statement detailing why such support is being offered
 - Proof of association with the Program(s) the business wishes to support
 - The business' company mission or statement of purpose as it relates to environmental health and protection
 - The amount of support being offered
 - Expectations of any goods or services because of the support
- The company providing commercial support will in no way have any influence on any Certificate course material development, learning outcomes, or course assessments. The courses are designed based on the Certificate Program Plan per ANSI standards and will not be influenced by any amount or type of commercial support.
- NEHA will disclose any commercial support of a Certificate Program through a separate page on nehatraining.org titled, "Thank you to our Supporters" and include a link to the supporter's web site if they so desire.

Fees, Cancellations, and Refunds

Policy: NEHA Certificate course costs will not exceed any price limitations set in state codes and/or laws.

Purpose: To outline costs and associated fees for NEHA Certificate courses.

Procedure:

- NEHA will charge Certificate Program course instructors a fair and reasonable cost for course materials based on production of materials and administrative time. It is up to the course instructors to abide by state and local regulations on any limitation of course fees.
- NEHA will audit instructor's fees at regular intervals based on instructor marketing materials and past violations.
- If the instructor cancels the course, a full refund will be given to all paid participants by the instructor.
- If a participant is unable to attend the course after making payment, the instructor must be notified in writing, by mail or email, at least 7 business days prior to the course date for a full refund. Within 7 business days of the course, a refund to the participant is not required, although an individual instructor may return all or some of the course fee at their discretion.
- An instructor may not order and/or pay for training books and materials that will not be used.
- In the case of an emergency or if a participant must leave the class after beginning the course, a refund will not be given; however, the participant will have the opportunity to attend another session of the same course by the same instructor at another time.
- If a participant fails the summative assessment, they must retake the course and summative assessment. There may be a cost associated with the retake.

Non-Discrimination

Policy: No individual is excluded from the NEHA Certificate Program based on any attributes other than their eligibility to sit for the Certificate Program's summative assessment.

Purpose: Ensure fair practices in the Certificate process.

Procedure:

- NEHA is committed to the principle of equal opportunity in its activities and programs and does not allow, condone, or support discrimination of any type (whether based on ethnic origin, nationality, religion, sex, race, gender, sexual orientation, age, or disability) within its organization, practices, procedures, or vendors. This policy also applies to NEHA employees, members, and supporters.
- Whether participating in a certificate or certification program, whether as an employee, member, or supporter, in the unlikely event the individual feels they have been discriminated against for whatever reason, they are directed to notify the NEHA at support@neha.org, or 303-756-9090 (US Mountain Time, Monday - Friday, 9:00 am – 6:00 pm), and in writing where possible, so that the issue can be research and corrected as needed.

Compliance with the American Disabilities Act

Policy: NEHA is committed to ensuring that no individual is deprived of the opportunity to take a certificate class solely by reason of a disability or impairment. All course facilities are fully accessible and compliant with the American with Disabilities Act.

Purpose: To comply with the American with Disabilities Act and provide equal opportunities to those with disabilities or impairments.

Procedure:

- NEHA's certificate and certificate programs are compliant with ADA requirements. NEHA makes every effort to accommodate individuals with a "physical or mental impairment that substantially limits a major life activity", as defined by the current Act.
- When an individual applies for special accommodations based on a disability or impairment, such requests will be forwarded to NEHA's trainers and/or course providers to make such arrangements.

NEHA Certificate Program Personnel

Policy: The NEHA Certificate Programs are staffed and managed by qualified people

Purpose: To communicate the expectations and requirements of staff working with the NEHA Certificate Program

Procedure:

- All personnel will have a current job description and a current resume.
- All NEHA Certificate Program personnel affirm, on an annual basis, they have read the NEHA Certificate Program Policies and Procedures.
- All Personnel will affirm they are aware of their job descriptions and have been adequately trained to perform their role within the NEHA Certificate Program
- EZ will maintain an up-to-date organizational chart for the NEHA Certificate Program.
- NEHA Certificate Program staff will be evaluated on an annual basis. All evaluation outcomes will be documented. Training and development plans will be created when/if deficiencies in EZ Certificate Program oversight are noted.
- The Certificate Program Administrator (CPA) shall monitor, on an ongoing basis, the performance of contractors in carrying out assigned responsibilities in accordance with these policies and procedures.

Outsourcing / Trainer Roles and Responsibilities

Policy: The instructor-led NEHA Certificate Program courses are overseen by NEHA trainers at various sites around the country. Trainer qualifications are outlined in their respective course handbooks.

Purpose: To clarify the roles and responsibilities of a NEHA trainer

Procedure:

Only accepted and approved NEHA Food Safety Trainers can teach and administer exams.

- The role of all NEHA course trainers is to provide a fair, professional environment conducive to maximum performance by all participants. This can only be accomplished by maintaining standardized procedures and conditions while providing a comfortable environment.

- Trainers will provide a confirmation email to all course participants. The confirmation will contain the participant's name, the course location, and the date of the course.
- Organization of participants, distribution of course materials, and course instructions will begin promptly at the posted start time.
- The in-classroom NEHA Certificate Program courses require seat time as defined in the course specific handbooks.
- Trainers must verify participant identity by requiring a government-issued photo ID (such as a valid driver's license) along with the participant's registration confirmation.
- The Certificate Program trainer is responsible for the following tasks:
 - Selecting and scheduling of course site
 - Procuring adequate staff based on registration counts
 - Accounting for and security of NEHA course materials
 - Supervising course day procedures
 - Delivering the appropriate course assessment and reading assessment instructions provided by NEHA
 - Providing NEHA course evaluations to each participant
 - Maintaining professional standards
 - Keeping all assessments and assessment answers secure and private
 - Shipping of course evaluations and all materials, including participant scores, back to NEHA after in-person training courses within 30 business days
- Trainers must follow the NEHA Certificate Course syllabus and PowerPoint presentation for the course being taught to ensure consistency across all classes/trainers and ensure achievement of course learning outcomes.
- Cancellations, refunds, and fees information can be found in the course-specific handbook.
- The Certificate Program Trainer agrees to abide by NEHA's Certificate Program Policies and Procedures referring to personnel associated with the Certificate Programs. This specifically relates to course security and record and document control regarding:
 - Course materials
 - Course assessments
 - Participant identification
 - Participant scores
- The Certificate Program Trainer must sign the NEHA Certified Trainer Chartered Principles and Affidavit of Nondisclosure, thereby agreeing to the Trainer Roles and Responsibilities mentioned therein, prior to training any of the NEHA Certificate Program courses. By signing these forms, each trainer agrees to follow the Chartered Principles and the Trainer Roles and Responsibilities for all NEHA Certificate courses.
- If a trainer fails to abide by the previously mentioned Trainer Roles and Responsibilities, it will result in a written warning asking the trainer to comply with the policy (at 60 Days of non-compliance). If the trainer still does not follow the Trainer Roles and Responsibilities, a second

written warning will be given (at 90 days of non-compliance). A Suspension will be issued, and a permanent notation made in the trainer's file, if they fail to comply after 120 days. The trainer will not be able to order any further Food Handler Certificate Program materials until they have responded to the stipulation and are in full compliance with the policy. Continued refusal to comply will result in the trainer losing the opportunity to participate or train in the NEHA Certificate Program. Trainer does have a right to appeal to the members of the Advisory Group.

Records and Document Control

Policy: All individual records and documents pertaining to NEHA's Certificate Programs are kept under secure conditions so that an individual applicant's information is not readily accessible to others.

Purpose: To show adequate control and security of Certificate records and documents.

Procedure:

- The Certificate Program Administrator will follow the procedures for quality checking records and monitoring.
- NEHA provides learners and Certificate holders with verification and documentation of:
 - The progress or completion of the program
 - The Certificate issue date
 - The Certificate term of validity (when applicable)
- All individual records and documents pertaining to NEHA's Certificate Programs are stored separately from other NEHA programs.
- All NEHA records and documents are kept for a minimum of seven (7) years in accordance with our organizational standards.
- Documents are under the authority of the Certificate Program Administrator, with authority from the EZ Associate Director, Education, and may only be inspected by someone outside of the organization with 2 weeks' prior notice and just cause to do so. Examples of potential allowances are auditors, employers, and/or anyone with legal cause to review documentation.
- Requests for validation or documentation must be made in writing and sent to support@neha.org. Requested information is provided by NEHA within 15 business days of receipt of requests.
- The Certificate Program documents kept under control are:
 - Trainer Information
 - Application
 - Confirmation or Commitment and Release of Liability
 - Course rosters
 - Completed assessments

- Participant evaluations
 - Participant Information
 - Course registrations
 - All personal information
 - Assessment scores
 - Course evaluations
 - Program Information
 - Course surveys
- All records and documents listed are held securely under lock and key in the EZ office by the EZ Certificate Program Administrator. Electronic records are also stored securely on NEHA's secure SharePoint site.
- All participant information is held securely per the Trainer Roles and Responsibilities, by NEHA trainers, for at least the term of certificate validity.
- Paper documents are disposed of by shredding the original and any copies made from that original. Online documents are disposed of by deleting the records from the online storage location. The EZ Certificate Program Administrator, under authority from the EZ Associate Director, Education, is responsible for disposing of the documents that are held by the EZ department. The trainers are responsible for correctly disposing of the documents that are held by the trainers, per the Trainer Roles and Responsibilities policy.
- As new versions of existing course materials, policies and procedures, and trainer or participant forms become available, the prior versions must be disposed of and replaced by the new document(s). This is to ensure that everyone associated with the Certificate Program courses have the same, updated information.
- The Certificate Program Administrator has access to all records stored on SharePoint and will enter the paper records into SharePoint. All individuals involved with the Certificate Program have access to the ANSI SharePoint folder for recovery purposes.

Confidentiality, Privacy, and Security

All staff, trainers, and Advisory Group members associated with the Certificate Program are required to sign the Affidavit of Nondisclosure and Confidentiality for NEHA Certificate Programs per the Course Security policy.

Internal Audit

Policy: NEHA conducts internal auditing on an annual basis as an independent appraisal function to examine and evaluate the NEHA Certificate Program procedures and administrative activities as a service to our stakeholders.

Purpose: To measure and evaluate the effectiveness of Certificate Program policies, procedures, and other controls, and when deficiencies are found to help establish corrective actions.

Procedure:

Specifically, the auditor will:

- Evaluate the adequacy of the internal control structure within the Certificate Programs to manage risk.
- Assess the extent of compliance of each program with applicable laws, regulations, policies, and procedures.
- Verify the existence of assets and proper safeguards for their protection.
- Evaluate the adequacy, reliability, and effectiveness of financial and personnel reporting systems and procedures.
- Appraise the quality of management's performance in carrying out assigned duties and accomplishing goals and objectives.
- Perform audits directed toward cost savings and/or revenue enhancement opportunities.
- Review policies and procedures for any discrepancies or necessary updates.
- Review trainer records.
- Review the management of records and handling of documents.
- Review and document any complaints or appeals.

Management Review

Policy: NEHA Certificate Program is evaluated by management to measure the quality, effectiveness, and value of the Certificate Program against stated Program performance objectives.

Purpose: To communicate how NEHA Certificate Program is evaluated to measure the quality, effectiveness, and value of the Certificate Program against stated Program performance objectives.

Procedure:

- The EZ Associate Director, Education will conduct a management review of the Certificate Programs annually.
- The evaluation will consist of reviewing:
 - Results of internal audit
 - Results of external audit (if applicable)
 - Status of corrective and/or preventive actions
 - Results of trainer performance monitoring
 - Results of program evaluation
 - Complaints received
 - Appeals received
 - Follow-up actions from previous management reviews
- Decisions and actions related to improvement of the management system, improvement of the certificate program activities, or any identified additional resource needs will be recorded in the Management Review document and discussed at the Management Review meeting.

- During the Management Review meeting, any needed corrective or preventive actions will be recorded in the Corrective and Preventive Action Log, for continuous improvement of the Certificate Program.
- The management system will be reviewed to ensure continued suitability, adequacy, and effectiveness.
- The results of the Management Review will be discussed at the Advisory Group annual meeting.
- Program success and accomplishment of intended learning outcomes, as listed in the Program Performance Objectives policy, will be measured by the participants' summative assessments.
- Learner satisfaction will be measured by participant evaluations, using the Self-assessment of Learning and Training form.
- Learning objectives will be measured by the summative assessment at the end of the course.
- Audits for Certificate Program trainers will be conducted randomly to evaluate their effectiveness and verify compliance with NEHA policies and procedures during the Internal Audit (performed annually).

Corrective and Preventive Actions

Policy: The NEHA Certificate Programs have a system for recording and correcting current and potential issues within the Program

Purpose: To communicate the NEHA Certificate Program corrective and preventive actions

Procedure:

- All identified corrective and preventive actions will be recorded in the Corrective and Preventive Action Log.
- The EZ Certificate Program Administrator will include corrective and preventive action updates in the Advisory Group annual meeting agenda.
- The EZ Certificate Program Administrator will manage the Teams messaging site titled Certificate Program Management, where anyone involved with the EZ Certificate Program can communicate potential and real issues with the Certificate Program. All communications will include a response from the EZ Associate Director, Education and/or the EZ Certificate Program Administrator.
- Approval of changes from the EZ Associate Director, Education and/or the EZ Certificate Program Administrator
- Significant outcomes from the internal meeting will be communicated with the Advisory Group. Outcomes that change will be included in the minutes of the meeting.
- Routine changes to prevent or control issues will be put in place as soon as recognized.
- All corrective and preventive action progress will be recorded in the Corrective and Preventive Action Log, Advisory Group minutes, and/or the Teams Certificate Program Management chat and/or folder.