



CSA CODE OF PROFESSIONAL RESPONSIBILITY

CSA CODE OF PROFESSIONAL RESPONSIBILITY

INCLUDES SCSA MEMBERSHIP RULES

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Foreword

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

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

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

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

CSA Code of Professional Responsibility

PURPOSE

The Society of Certified Senior Advisors (SCSA) created the CSA Code of Professional Responsibility (the “Code”) to provide ethical standards and rules of conduct for all persons who are certified by SCSA to use the Certified Senior Advisor (CSA)[®] designation. The CSA Board of Standards (the “Board” or “BOS”), an independent, nonprofit corporation established in the State of Indiana in October 2001, investigates formal complaints lodged against CSAs for alleged violations of the Code. The Board reviews all complaint cases and disciplines CSAs when appropriate.

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

CSA designees are required to comply with the Standards and Rules set forth in this Code. CSA designees 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 designee is a member.

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

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

PARTS OF THE CODE

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

The Rules. The Rules are derived from the Standards. The Rules establish requirements for professional behavior that a CSA designee 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.

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 STANDARDS

Standard 1: Competence. A CSA designee 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 CSA designees must comply with the rules and regulations that govern the registrations, licenses and/or credentials they hold. CSA designees 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 designee 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 designation. *A CSA designee who performs services, or offers to perform services, that are beyond the scope of his or her professional license and/or credential may be subject to Board action.*

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

Standard 2: Honesty. A CSA designee shall not lie, cheat, or steal. A CSA designee 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 designee shall not omit from business materials or discussions — or otherwise disguise in technical, legal, or industry-specific terminology (“jargon”) — information that the CSA designee’s client or potential client would need to fully comprehend proposed products or services.

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

interests of the client; and shall be dependable, honoring personal and professional promises made.

Standard 4: Fairness. A CSA designee shall conduct his or her professional activities fairly and impartially, using the same standard of care in performing business activities. Further, the CSA designee 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 designee shall safeguard client, potential client, and business associate information, maintaining complete confidentiality unless such party has specifically released the CSA from such duty, or in the event that such information is required to be divulged in response to proper legal mandate.

Standard 5: Professionalism. A CSA designee 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 designation and of any other licenses or credentials he or she holds.

THE RULES

INTRODUCTION

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

RULES THAT RELATE TO THE STANDARD OF COMPETENCE

Rule 101. A CSA designee 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 designee 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 SCSA in the form of CSA CE requirements.

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

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

Rule 105. Any CSA designee 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, at its discretion, 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 designee shall not charge fees based solely on the basis of the CSA designation, and shall not assert or claim that the CSA designation qualifies him or her to give advice outside the scope of such CSA's professional occupation and license(s).

RULES THAT RELATE TO THE STANDARD OF HONESTY

Rule 201. A CSA designee 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 designee shall not solicit clients through false or misleading

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

Rule 203. A CSA designee shall not provide professional advice, services, or products through dishonesty, fraud, deceit or misrepresentation either directly or by omission. Further, such CSA designee 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 designee shall not represent the views of SCSA, or purport to represent such views, unless the designee has been expressly authorized by SCSA to do so. The designee shall at all times clearly identify his or her personal or professional opinions.

RULES THAT RELATE TO THE STANDARD OF TRUSTWORTHINESS

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

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

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

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

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

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

RULES THAT RELATE TO THE STANDARD OF FAIRNESS

Rule 401. A CSA designee 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 designee's business affiliation, mailing and e-mail address, company website, telephone number(s), as well as any changes to professional credentials, qualifications, and licenses.
- (b) Any other information required to be disclosed in accordance with, and in a manner compliant with, applicable laws, rules, and regulations.

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

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

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

Rule 404. A CSA designee 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 designee 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 designee shall equally apply the same standard of care in providing professional services to clients, potential clients, or other persons.

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

RULES THAT RELATE TO THE STANDARD OF PROFESSIONALISM

Rule 501. A CSA designee shall follow all credentialing requirements for earning and maintaining the CSA designation as put forth by SCSA. This includes, but is not limited to, complying with payment obligations for purchases of SCSA services or products, and fulfilling any ongoing SCSA educational requirements.

Rule 502. A CSA designee shall use the CSA designation and/or marks in accordance with the rules and regulations for such usage as established by Society of Certified Senior Advisors. See Appendix B, Usage Standards for the CSA Logo and Marks, for more detailed rules.

Rule 503. A CSA designee whose CSA designation has been revoked, or who has not renewed his or her membership, shall not use the CSA designation and/or marks in any media or for any purpose whatsoever either orally or in writing.

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

Rule 505. A CSA designee 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 designee 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 designee shall carefully evaluate a client's or potential client's financial or medical circumstances (according to the designee's field of expertise) prior to providing advice and/or services, and the designee shall provide only the advice and/or services to such client that are appropriate to each client's particular circumstances.

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

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

Rule 510. A CSA designee who has been notified by the CSA Board of Standards that he or she is the subject of a complaint cannot relinquish the CSA designation or resign membership in SCSA to avoid disciplinary action.

THE DISCIPLINARY PROCEDURES

THE CSA BOARD OF STANDARDS

The CSA Board of Standards, Inc. (the "Board"), an independent, nonprofit corporation, was established to review and resolve complaints lodged against Certified Senior Advisors for alleged violations of this Code. The Board has original jurisdiction over all such complaints and is solely and exclusively responsible for 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 SCSA 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 designation. The administrative suspension is put in place prior to notifying the CSA that he or she has been named as the subject of a complaint — and in advance of the complaint hearing. The administrative suspension, which may be imposed by direct Board action or by the Board's designee at the direction of the Board, suspends a CSA's right to use the designation if such CSA is named as the subject of, or is named as an associate to the subject of, a complaint or investigation by any governmental, licensing, or certifying agency or body authorized to instigate such action that charges, alleges, or investigates conduct of the CSA, which would, if proven, establish a violation of this Code by the CSA.
2. Enlist the aid or assistance of one or more CSA designees in good standing to assist with investigations.
3. Appoint staff members to perform administrative functions of the Board.
4. Periodically report to SCSA 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.
7. Impose sanctions against and discipline CSA designees as provided for in this Code.

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*.

SCSA may act as complainant and lodge a complaint if it discovers that a CSA's

alleged unethical 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 designee 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 mailed to the Board at the following address:

CSA Board of Standards, Inc.
1685 S. Colorado Blvd., Unit S, #272
Denver, CO 80222

Shortly after it receives the complaint, the Board notifies the CSA designee who is named as the subject of the complaint. The Board requires that such CSA designee 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 notifies the CSA designee that he/she is named as the subject of the complaint.
3. The Board performs an initial review of the complaint case to determine its suitability for full Board review.
4. The Board reviews the complaint case, with optional CSA designee participation. This review may span more than one Board meeting.
5. The Board dismisses the case or imposes some other judgment as it deems appropriate.
6. The Board of Standards Appeals Panel reviews any appeal filed by a CSA designee who disputes the judgment imposed by the Board.

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

DISCIPLINARY ACTIONS IMPOSED

The Board is empowered to impose a range of sanctions, which include:

1. **Administrative Suspension.** The Board may choose to impose an administrative suspension of a CSA designee's right to use the CSA designation prior to notifying the CSA that he or she has been named as the subject of a complaint — and in advance of the initial complaint hearing. The Board may lift or continue the administrative suspension depending on its review findings.

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

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

4. **Suspension.** The Board may order suspension of the right of the designee to use the designation 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 these individuals certain educational or other tasks, completion of which is required in order to lift the suspension. The Board reserves the right to publish the fact of suspension together with identification of the CSA designee 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 designee may be required to reinstate or recertify his or her CSA designation under terms prescribed by the Board and in compliance with SCSA's policies on reinstatement or recertification.

5. **Revocation.** The Board may order permanent revocation of a CSA designee's right to use the designation. 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 designee on SCSA's website, or by another method. Unless otherwise mandated by the Board, revocation of a CSA's right to use the designation

shall be permanent.

Disciplinary decisions of the Board are subject to review at the request of Certified Senior Advisor (CSA)[®] designees 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 designee 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 designee 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 designee's right to use the Certified Senior Advisor (CSA)[®] designation 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 designee 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.

Results of CSA Board case reviews are kept confidential. At its discretion, however, the Board (or SCSA, at the Board's direction) may release details of specific case reviews to certain federal and state licensing and credentialing bodies and 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.

Appendix A to CSA Code: Advertising Rules for CSAs

INTRODUCTION

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

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

DEFINITION OF TERMS

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

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

GUIDELINES FOR CSA ADVERTISEMENTS

CSAs are required to implement consistently the following elements when designing

new advertisements, recasting existing ones, or purchasing pre-existing advertising packages or systems:

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

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

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

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

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

senior organization if they are not

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

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

- (a) Present the CSA, whether directly or indirectly, as able to provide products or services that are beyond the scope of the CSA's profession, as established by professional licenses or credentials.
- (b) Omit or obscure the CSA's true professional standing and qualifications.
- (c) Omit or obscure the true purpose of a seminar, presentation, workshop, or other promotional activity.
- (d) Disparage other professionals, professions, agencies, and organizations or the recommendations or policies they advocate.
- (e) Imply that other professionals, professions, agencies, and organizations in some way conspire, or have conspired, to issue policies or regulations for the purpose of overcharging or otherwise exploiting a particular group.
- (f) Attempt to alarm or panic members of an intended audience by misconstruing, highlighting, or sensationalizing selective data from industry market trends or legal rules and regulations. No material fact or qualification may be omitted if the omission would cause the advertisement, or the element of the advertisement, to be misleading.

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

In practical terms, this means that:

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

6. Disclosure Statement. SCSA 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. The CSA designation alone does not imply expertise in financial, health or social matters. Details: www.csa.us

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

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

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

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

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

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

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

WHY HAVE GUIDELINES FOR USE OF THE CSA LOGO AND DESIGNATION MARKS?

The integrity of the marks reflects the trustworthiness of SCSA and your standing as a Certified Senior Advisor (CSA)[®]. Improper use of the logo and designation 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, former CSAs who have let their SCSA membership expire, or CSAs who are under 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 SCSA 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 SCSA, with a brief explanation of where, when, and how they came across the communication.

WHAT ARE THE CSA DESIGNATION MARKS?

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

- CSA (without “®”) in conjunction with spelling out “Certified Senior Advisor”
- Certified Senior Advisor (CSA)[®]
- Certified Senior Advisor
- The “member” logo, which appears directly below:



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

Society of Certified Senior Advisors has its own logo, which appears below (the word “Society” appears in this logo). The Society logo is for Society’s use only.



I. BASIC RULES FOR THE CSA DESIGNATION AND MARKS

A. All CSA designees acknowledge and agree that Society of Certified Senior Advisors® (SCSA) owns all rights, title, and interest in the designation and the marks.

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

II. GENERAL GUIDELINES FOR USE OF THE MARKS

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

Guideline 1. The CSA designation 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 Certified Senior Advisor	Jones & Co., CSAs
“ . . . John is also a member of Society of Certified Senior Advisors® . . . ”	“ . . . many financial professionals on our staff are Certified Senior Advisors . . . ”
Joan I. Jones, Certified Senior Advisor (CSA)®	Jones & Co., Certified Senior Advisors (CSA)

Correct Use	Incorrect Use
 <p data-bbox="354 432 613 464">John I. Jones, CSA</p>	 <p data-bbox="1024 432 1284 464">Jones & Co., CSAs</p>

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

Correct Use	Incorrect Use
<p data-bbox="147 753 760 831">Joan I. Jones, CSA President of INC., Certified Senior Advisor</p>	<p data-bbox="841 753 1112 831">Joan I. Jones, CSA® Joan I. Jones, CSA™</p>
<p data-bbox="147 842 797 877">John I. Jones, Certified Senior Advisor (CSA)®</p>	<p data-bbox="841 842 1382 919">John I. Jones, Certified Senior Advisor (CSA)™</p>
<p data-bbox="147 930 703 966">Joan I. Jones, Certified Senior Advisor®</p>	<p data-bbox="841 930 1398 966">Joan I. Jones, Certified Senior Advisor™</p>

Guideline 3. The CSA member logo cannot appear on any business materials alone; it must have the CSA’s name clearly associated with it. *Note: materials marketed and sold by SCSA are not subject to this guideline.*

Correct Use	Incorrect Use
 <p data-bbox="354 1503 613 1535">John I. Jones, CSA</p>	

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

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

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

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

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

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

COLOR SPECIFICATIONS FOR THE CSA MEMBER LOGO

SCSA sends to newly designated CSAs a “New Member Kit” and access to the Member Portal, which contains electronic art files for printing the CSA member logo. Color specifications for the logo elements appear below.

100% Blue:
PMS 2945U
or 294C



100% Gold:
PMS 131U or
131C

- 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.

SCSA Membership Rules

This Membership Rules document describes certain obligations for individuals who have been awarded the Certified Senior Advisor (CSA)[®] designation by Society of Certified Senior Advisors[®] (SCSA), as well as for those individuals who are in the process of earning it.

It also describes the role and administrative powers retained by SCSA, the SCSA Certification Council, and the CSA Board of Standards in connection with awarding and administering the CSA credential and monitoring its proper use.

In addition, this document summarizes the following SCSA membership procedures:

- Annual Membership Renewal
- Reinstatement
- Redesignation
- Recertification
- CSA CE requirements

IMPORTANT: All CSAs are required to read and acknowledge the information contained in this document, as well as in the *CSA Code of Professional Responsibility* (the “Code”).

I. SOCIETY OF CERTIFIED SENIOR ADVISORS (SCSA)

SCSA awards the Certified Senior Advisor (CSA)[®] credential to qualified professionals who meet the CSA eligibility criteria and pass the credentialing examination. Individuals who earn the credential have an initial one-year membership in SCSA, renewable annually.

SCSA administers the CSA designation program, coordinates member services and benefits, and tracks all individuals who have earned, or are in the process of earning, the CSA designation.

SCSA Certification Council. The independent SCSA Certification Council oversees the CSA designation 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 designation exam.

A. SCSA AUTHORITY TO ACCEPT OR DENY ENROLLMENT APPLICATIONS

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

B. SCSA AUTHORITY TO WITHHOLD ENROLLEE DESIGNATION

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

C. SCSA AUTHORITY TO RESOLVE NONPAYMENT OF PRODUCTS OR SERVICES

At its discretion, and in accordance with its accounting processes, SCSA may take the following actions upon nonpayment of SCSA products or services:

- for pre-class enrollees: prevent attendance in class
- for pre-test applicants: prevent testing
- for CSAs: suspend, revoke, or prevent reinstatement, re-designation, recertification or annual renewal of the CSA designation

D. SCSA AUTHORITY TO ENSURE PROPER USE OF CSA DESIGNATION AND/OR MARKS

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

E. SCSA AUTHORITY TO ADDRESS CASES OF WRONGFUL USE

CSAs in good standing — those who have fulfilled all SCSA-mandated requirements for earning and maintaining the CSA designation — are authorized to use the Certified Senior Advisor (CSA)[®] designation, 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 designation, logo, or marks in any media and for any purpose. Those who use the CSA designation without SCSA authorization to do so are guilty of wrongful use. SCSA reserves the right to notify regulators of CSA designation wrongful use on the part of such individuals.

The table below summarizes SCSA’s authority to address wrongful use of the CSA designation:

For these individuals . . .	SCSA’s response to wrongful use is . . .
Those who have not passed the designation examination	<ul style="list-style-type: none"> • Cease and desist letter • Notification to state regulators • Further legal action if warranted
Enrollees in the CSA designation program who have not completed eligibility requirements for designation	<ul style="list-style-type: none"> • Cease and desist letter • Notification to state regulators • Disenrollment from CSA Designation Program • Mandatory 3-year period before application for re-enrollment is allowed • Further legal action if warranted
Former CSAs who have let their memberships expire	<ul style="list-style-type: none"> • Cease and desist letter • Notification to state regulators • Mandatory 3-year period before application for reinstatement is allowed • Further legal action if warranted

F. SCSA AUTHORITY TO INVESTIGATE DISCLOSURE INFORMATION

Individuals who apply for the CSA designation program, as well as CSAs who renew their SCSA annual membership, are required to disclose to SCSA information about legal, administrative, regulatory, or other actions in which they are or have been involved. At its discretion, SCSA may request more information from the applicant or renewing CSA and may take other steps to investigate these disclosures. On the basis of its findings, SCSA may accept or deny applications or renewals, or may accept applications or renewals on a provisional basis pending the outcome of a civil, legal, or regulatory action.

II. THE CSA BOARD OF STANDARDS

The CSA Board of Standards, Inc. (“BOS” or 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 designation. Sanctioned CSAs may file an appeal with the Board’s Appeals Committee.

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

III. MEMBERSHIP RENEWALS, REINSTATEMENTS, REDESIGNATIONS, AND RECERTIFICATIONS

A. ANNUAL RENEWAL OF SCSA MEMBERSHIP

CSAs must renew their SCSA membership each year after their first year in order to continue using the CSA designation and marks. To do this, the CSA must:

- Complete, sign, and return to SCSA the annual membership renewal form, which includes mandatory disclosure information
- Affirm that he/she has met any applicable CSA CE requirements for the renewal year
- Pay the annual membership renewal fee (referral coupons may be used as credit toward the renewal fee)

SCSA applies a CSA’s annual membership renewal fee to four general areas:

- **Publications.** All CSAs receive two electronic publication per quarter, a total of eight in a full year. These publications cover a range of evolving issues important to seniors and beneficial to CSAs who work with seniors. If you get just one idea from these publications that helps your business, your renewal fee has been well spent.

- **Member services and benefits.** Each day SCSA tracks member status, designs custom mailings and other communications, and addresses a host of issues for the benefit of its members. The annual renewal fee helps to fund these day-to-day operations.
- **CSA Board of Standards.** The annual renewal fee also funds operations of the CSA Board of Standards. The Board’s complaint reviews assure the public, and regulatory agencies, that CSAs who fail to act ethically and in the best interests of their clients are appropriately disciplined.
- **SCSA compliance activities.** SCSA also uses part of the annual renewal fee to investigate “wrongful use” of the CSA designation by non-CSAs. Members of the public frequently submit to SCSA business cards or advertising materials on which non-CSAs claim CSA membership. If SCSA confirms that wrongful use of the designation has occurred, it notifies the person(s) in question that their use of the designation is unauthorized and that they may be subject to legal action as a result. SCSA joins all members in good standing in demanding that a person who uses the designation has actually earned it.

B. RESTRICTIONS ON RENEWAL

A CSA who is under suspension cannot renew his or her membership until such suspension has been lifted.

C. SCSA RIGHTS AT RENEWAL

SCSA reserves the right to decline the renewal of any CSA who has not complied with the CSA Code, the SCSA Membership Rules, and/or other established criteria for maintaining membership in SCSA. SCSA also reserves the following rights at renewal:

- **Investigating “affirmative answers.”** SCSA 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, SCSA may ask the renewing 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 SCSA 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 SCSA demonstrate their integrity and professionalism — and expedite the review of their renewal.

D. REINSTATEMENT OF THE SCSA MEMBERSHIP

A CSA whose designation has expired for less than a year can reinstate his or her SCSA membership. CSAs who wish to reinstate must do the following:

- Complete, sign, and return to SCSA the reinstatement form, which includes mandatory disclosure information
- Pay the reinstatement fee

CSAs who qualify for reinstatement are not required to re-take the CSA examination. After SCSA approves the application for reinstatement, the CSA will be sent a new certificate with a new designation date. Future renewals will be based on this date.

E. REDESIGNATION OF THE CSA CREDENTIAL

A CSA whose designation has expired for more than a year can redesignate his or her CSA credential. CSAs who wish to redesignate must do the following:

- Complete, sign, and return to SCSA the redesignation form, which includes mandatory disclosure information

- Complete the *CSA's Role, Rules and Responsibilities (CSA Code of Professional Responsibility)* online module and sign the *CSA Code of Professional Responsibility* and SCSA Membership Rules
- Verify that he/she has read and agrees to abide by the SCSA Membership Rules
- Pay the redesignation fee
- Verify that he/she meets all eligibility requirements in effect at the time of application
- Re-take and pass the CSA examination

Note: CSAs who have had a membership lapse and have redesignated must use their "redesignation date" as the date from which their CSA credential is deemed active. They may not use their original designation date.

IV. CSA CONTINUING EDUCATION (CSA CE) RECERTIFICATION REQUIREMENTS FOR CSAS

As of January 1, 2011, CSAs are required to complete 30 CSA CE credits every three years to recertify and to remain a member of SCSA and use the CSA designation. These 30 credits include the requirement to earn 3 ethics credits by completing the online module *The CSA's Role, Rules and Responsibilities*, which covers the *CSA Code of Professional Responsibility*, during *each* three-year recertification cycle. On a periodic basis SCSA conducts random audits of active CSAs to confirm that CSA CE requirements are being met.

The table below summarizes Society's CSA CE requirements policy:

A CSA who earned the designation should follow this timeline for fulfilling CSA CE requirements:
Prior to January 2004	<p>You are grandfathered based on the month you designated. Regardless of the actual year, you are considered to have been designated in "[month], 2004."</p> <ul style="list-style-type: none"> • You are in the group of CSAs who designated January 1, 2004 – December 31, 2010 (see below).

A CSA who earned the designation should follow this timeline for fulfilling CSA CE requirements:
<p>January 1, 2004 through December 31, 2010</p>	<p>Starting from your designation date, you have 3 years through the end your designation month to fulfill the CSA CE requirement to recertify for year four.</p> <p>For example, if you designated on March 15, 2006, you have until March 31, 2009, to fulfill your CSA CE requirement.</p> <p><i>Transition Policy:</i> You may earn 18 CSA CE credits in your <i>current</i> 3-year recertification period; then starting in your <i>next</i> 3-year recertification period, you must earn 30 CSA CE credits.</p> <p>For example, if you designated October 1, 2008, you have until October 31, 2011 to earn 18 CSA CE credits; then starting in your <i>next</i> 3-year period (November 1, 2011 through October 31, 2014), you must earn 30 CSA CE credits every 3 years.</p>
<p>On or after January 1, 2011</p>	<p>Starting from your designation date, you have 3 years through the end your designation month to fulfill 30 CSA CE credits to recertify for year four.</p> <p><i>For example:</i> If you designated on June 15, 2011, you have until June 30, 2014, to fulfill your 30 CSA CE credits for year four.</p> <p>Starting from your designation date, you have three years through the end your designation month to fulfill your 30 CSA CE credits to recertify for year four.</p> <p>For example, if you designated on June 15, 2011, you have until June 30, 2014, to fulfill your 30 CSA CE credits for year four.</p>

A. OPTIONS FOR EARNING 30 CSA CE CREDITS

CSAs can fulfill their remaining 30 CSA CE requirements every three years in a number of ways, which include:

- Completing optional online CSA CE ethics at <http://csa.webce.com>. Tuition for the CSA CE ethics courses is offered at no charge to active members.
- Completing CE courses or attending professional CE conferences that deal directly with topics related to senior issues and that are offered by SCSA-selected providers
- Logging volunteer hours with a senior organization or cause
- Conducting group presentations approved by the SCSA Certification Council

For more detailed information on CSA CE options and requirements, please visit the SCSA website at www.csa.us.

V. SCSA TERMS OF DESIGNATION

1. I understand that I am permitted to use the mark Certified Senior Advisor (CSA)[®] and related marks for a period of one year from the date of my CSA designation, assuming I remain a member in good standing. If I fail to comply with requirements to renew my membership in SCSA at the end of the first year and annually thereafter, 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 has the authority to revoke my CSA designation, 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.

3. In consideration of the designation granted, neither the CSA Board of Standards, nor SCSA, 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 and SCSA from any liability for such actions or omissions.

4. I will fulfill any ongoing continuing education required by SCSA. I must complete 30 CSA Continuing Education (CSA CE) hours every three years to renew my membership for the fourth year, which includes 3 ethics credits by completing *The CSA's Role, Rules and Responsibilities* online module during each three-year cycle.
5. SCSA may suspend or revoke my CSA designation for nonpayment of enrollment or membership renewal fees, or for nonpayment of other purchases from SCSA.
6. I will comply with all rules and requirements of SCSA. If designated as a CSA, I will comply with all standards and requirements that SCSA may issue from time to time, including usage standards for the Certified Senior Advisor (CSA)® designation and all other SCSA proprietary mark(s). I acknowledge that SCSA is not responsible for any usage standards put in place by outside entities.



SOCIETY OF CERTIFIED SENIOR ADVISORS®

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