

Association of Threat Assessment Professionals
Certified Threat Manager Program Policy Manual

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CERTIFICATION PROGRAM

Vision Statement

Creating a safer world through targeted violence prevention.

Mission Statement

To serve the public's interest in preventing targeted violence by establishing a standard of professional competence in the field of threat assessment and management, and certifying professionals who meet that standard.

CERTIFICATION COMMITTEE

Structure and Group Representation

The Certification Committee will be comprised of volunteer members consisting of a Chair, Vice Chair, and other members representing the various disciplines involved in threat assessment and management. Committee members need not be members of the Association Board of Directors.

Selection of Members

The Chair of the Certification Committee will be selected by the Association Board of Directors (ABOD) President from the existing pool of Certified Threat Managers (CTM) and be approved by a majority of the ABOD. Members of the Certification Committee are CTMs and are selected by the Chair of the Certification Committee and approved by the ABOD.

Training of Committee

Members of the committee will participate in training to familiarize themselves with the certification program, program history, policy and procedure, administration, ethics, and management prior to assumption of duties as a committee member. Development and delivery of this training is determined by the current Committee Chair.

Conflicts of Interest

The responsibility for selection of Body of Knowledge (BOK) content, sensitivity of other content of the Certification Program such as but not limited to examination questions, as well as access to personal information of CTMs and applicants, increases the responsibility of this committee to ensure conflicts of interest do not exist.

Committee members will not have an actual or apparent financial interest in the Certification Exam content, procedure, development, or delivery. Authorship of a resource in the BOK is not, standing alone, sufficient to find a conflict exists.

If a Committee member has concerns about a conflict, the concern may be raised with the whole Committee for discussion. All reports of suspected, unresolved conflicts of interest will be investigated by the Association Sergeant at Arms (SAA) or Association Ethics Committee.

Confidentiality

Certification Committee members and assigned staff of the association management company with responsibility for the administration of the certification program will abide by strict confidentiality practices. All examination information, test development materials, testing materials, program research, candidate private information (such as test scores, applications, and communications) and other information determined as limited access will be subject to this confidentiality policy. Committee members agree to hold and maintain all confidential information in trust and confidence for the association and not to use confidential information other than for the benefit of the association. Except as authorized in writing by the ATAP President, committee members are not to disclose any confidential information, by any method, to any person other than Committee members or legal counsel for the Association.

Removal of Members

Members may be removed from the committee for a variety of reasons, which need not be fully enumerated herein. Other than when implicated by the second paragraph of this section, a removal must be approved by the committee Chair and supported by a two-thirds vote of the committee.

Members who are removed for reasons of impropriety such as but not necessarily limited to a criminal conviction, conflicts of interest, or ethics violations, may be removed by the Association President or the Certification Committee Chair, upon completion of an investigation by the Association SAA or Association Ethics Committee presenting substantial proof of a violation in the judgment of the President or Chair. A Committee member may be suspended from participating in Committee business by the Chair pending the conclusion of such investigation.

Duties and Responsibilities

Committee member duties will be determined by the Chair. Generally:

Chair – Oversight of the Committee, policies, and direction of the overall Certification Program.

Vice-Chair – Oversight of Certification Program content and updates; Chair of Certification Disciplinary/Ethics Subcommittee.

Candidate Assessment Members – As members of the Candidate Assessment Subcommittee, these members conduct evaluation of candidate applications. At least two Subcommittee members will vote on candidate applications, as long as a third member is available to vote in the event of a tie. This Subcommittee will evaluate candidate suitability based on guidelines established by the Certification

Committee. Members are appointed by the Chair of the Certification Committee and may include the Chair.

Ethics/Disciplinary Members – The Ethics/Disciplinary Subcommittee is responsible for investigation and action on alleged misconduct by CTMs and applicants. No fewer than three members of the Certification Committee are appointed by the Vice-Chair of the Certification Committee unless the Vice-Chair has a conflict of interest and cannot participate, in which case the Chair of the Certification Committee will make appointments. This subcommittee is assembled on an as-needed basis.

Board of Review – This subcommittee is responsible for consideration of appeals of decisions by the Ethics/Disciplinary Subcommittee on an as-needed basis when an appeal has been properly triggered. No fewer than three members are appointed by the Chair of the Certification Committee unless the Chair has a conflict of interest and cannot participate, in which case another member of the Certification Committee will assume the role of Chair of the Board of Review and make appointments.

CERTIFICATION

Term of Certification

The individual certification of “Certified Threat Manager” will last for two years from the date of issuance. It can be renewed under the conditions set out below.

Use of Terminology

Only current CTMs may use the terms “CTM” or “Certified Threat Manager” to self-describe. A person may disclose they are studying for the CTM Examination but may not use language that suggests CTM status is forthcoming or implies the status has been conferred when it has not been. The Association does not recognize CTM-adjacent terminology, such as but not limited to “CTM pending” or “CTM anticipated,” and therefore use of the same is not permitted.

Current CTMs are authorized to self-describe as a “CTM” or “Certified Threat Manager” but no amendments of, additions to, or variations on these terms are permitted.

Use of Credentials

A CTM may use the ATAP Certified Threat Manager term and logo on web-based and print materials and may only express the certification possessed as “Certified Threat Manager” or CTM. Modifications of the assigned certification title will be considered misrepresentations and therefore subject to review as a violation of the Code of Ethical Conduct. Certified individuals may not use the “ATAP” association logo for any marketing materials, nor produce materials suggesting ATAP or CTM program endorsement of their professional activities.

Certified individuals may neither state nor imply that certification is a requirement to engage in threat assessment and management, nor suggest that someone lacking the CTM designation should not be considered competent because of that fact.

CTM Status Publication

Inasmuch as an overarching purpose of the Certified Threat Manager Program is to establish a general standard of competency in a field directly related to public safety, it is in the public interest for the Certification Program to publish a list of those meeting that standard. Accordingly, the name and state, or country if outside the USA, of each CTM in good standing will be published on the ATAP website.

When discipline has been imposed other than a private, written censure, the CTM's name, the decision and date of disciplinary action, and the section of the Code of Ethical Conduct found to have been violated, will be published on the ATAP website.

Good Standing

A CTM is in good standing if they currently hold a CTM credential which is not revoked, suspended, or expired.

CANDIDATES

Eligibility Criteria

Certification as a "Certified Threat Manager" is open to the public and applies to all disciplines in which the professional practice of behavioral threat assessment and management in relation to interpersonal, planned violence is conducted. Individuals wishing to obtain certification must first apply for approval.

To qualify for approval, an individual must:

- Possess direct experience in conducting behavioral threat assessment and management of individuals at risk of engaging in planned, interpersonal violence as demonstrated by [a] five years of documentable and verifiable, qualifying threat assessment and management experience, or [b] by three years of documentable and verifiable, qualifying threat assessment and management experience along with two years of active membership in good standing with ATAP or affiliated and qualifying association.
 - The minimum qualifying experience requirement is further defined below in this subsection.
 - Applicants will be required to submit such evidence of this qualification as deemed appropriate by the Certification Committee.
- Supply at least two professional references who verify the candidate's required experience in threat assessment and management as required by the Committee.
- Self-reveal any past, present, or pending:
 - Civil Actions
 - Criminal Convictions
 - Regulatory Actions
 - Adverse professional ethics findings or departures from employment during an ethics inquiry
- Agree to abide by the ATAP Code of Ethics.

The Candidate Assessment Subcommittee (CAS) will evaluate experience and approve or reject applicants prior to testing and may request additional information beyond what was originally supplied if the Subcommittee is unable to render a decision without it.

An individual does not have to be a member of ATAP to obtain certification.

In evaluating an applicant's qualifications, the CAS will consider any information related to current or past activity which would or may constitute a violation of the ATAP Code of Ethical Conduct, unless the same information was already considered by the Certification Committee and no breach of ethics was found.

Qualifying Minimum Experience

Qualifying experience meets the following criteria:

- It is a function of the applicant's qualifying position of professional employment; and
- the candidate had a significant role in an average of six or more full behavioral threat assessments per year over the required duration. Significant means the candidate personally contributed to the analysis of relevant behavioral cues and to the ultimate judgment regarding the probability of violence.
- the methodology used must, in the judgment of the Candidate Assessment Subcommittee, reasonably comport with the Association's understanding of behavioral threat assessment and management.

In the application, to the extent that candidates are required to separately estimate their experience with personally participating in triage versus full assessments: Both "triage" and "full" behavioral threat assessments are a multi-source inquiry and analysis of a matter using an empirically-based and practice-supported methodology to estimate a level of concern for targeted violence. Triage assessments are conducted quickly upon intake and are based on facts available at the time a case is first referred. Full assessments encompass a deeper investigation and analysis of the totality of case facts which can feasibly be gathered under the circumstances. Cases which are assessed on multiple occasions over time in response to evolving facts constitute a single full assessment. A quick review of a situation or communication that only allows for a risk impression, because of time constraints or lack of sufficient behavioral cues or initial facts, is not an assessment.

Time to Take Examination

Upon approval of a candidate's application, they will have one year from the time of approval to take the certification test for the first time, after which a new application must be submitted. Denied applications may be appealed as set out below.

Notwithstanding any mandatory waiting periods following a failed examination, a candidate may retake the examination without submitting a new application for a period of two years. On the first day of the third year following the approval of an application, a candidate must submit a new application for approval.

APPLICATIONS

Fees

The fee structure for testing, re-testing and re-certification will be accessible on the ATAP website. The Committee will review the fee structure periodically and make changes when necessary. All fees must be paid prior to processing an application, sitting for the exam, or receiving a renewal of certification.

Candidate Application Process

Candidate applications are made via the method determined and published by the Certification Committee, generally via an online platform. It is the candidate's responsibility to provide the correct email address to receive communications from the online platform and to read all such messages.

The candidate application is a multi-step process. This process is essential to proper evaluation of qualification to take the examination for certification, and is as follows:

- 1) Candidate submits application, required attachments, and payment of the current fee.
- 2) Completed applications and supporting documentation are reviewed by the CAS, which meets for this purpose at regular intervals. Requests to expedite individual candidates' applications will not be granted.
- 3) Candidate responds to any requests for clarification or elaboration from the CAS within the time specified in the request for clarification or elaboration, generally 30 calendar days.
- 4) The CAS may also find it necessary to re-query a reference or allow a candidate to supply a substitute reference if an original reference statement does not provide the necessary verification.
- 5) Candidate is notified of approval or non-approval of application. If a candidate is not approved, they will be provided with the reason for such finding.

The candidate application document must include:

- Candidate name, address, telephone, employment information, date of birth, and whether they have ever applied to the program previously.
- Selection of the type of industry experience the individual is submitting for (five years of experience, or two years of experience plus two years of membership in ATAP or an affiliated TAP, defined as CATAP, AETAP, APATAP or AfATAP).
- An exhaustive resume or curriculum vitae which provides a detailed description of the requisite professional experiences, and any other evidence required or allowed by the committee. Guidance by the committee will be advertised on the ATAP website.
- Candidate attestations regarding legal history of civil, criminal, regulatory, and professional ethics actions, as required by the Certification Committee and articulated in the application.
- Link to the ATAP Code of Ethical Conduct with a confirmation of acceptance of being bound by its terms.

Requests for Additional Information

If a candidate's application lacks sufficient information upon which the Certification Committee can render a decision, the Committee may request additional information by rejecting an individual workflow step in the online application platform and requesting resubmission. A workflow step rejection is not to be construed as a denial of an application and must be responded to by the candidate for an application to proceed to further review. A rejected workflow step and request for additional information which does not receive a response by the elapse of 30 calendar days, or other period as specified in the step rejection message, will be considered a withdrawal of an application by the applicant. This does not prohibit the applicant from submitting a new application in the future.

EXAMINATIONS

Testing

Examinations will be taken via a web-based testing system, at a designated, in-person site in the presence of a live proctor. Candidates must be approved by the Committee and properly registered for a specific session to participate in an examination. All examinations are conducted with at least one on-site proctor approved by the Certification Committee.

Current examination specifications, such as the number and types of questions, as well as the duration of an exam session will be posted on www.atapworldwide.org.

Exam Protocols

The Certification Committee will provide examination protocols to be followed to proctors in advance of an examination session.

Proctors

Proctors should be current CTMs when available to a Chapter. When no CTM is available to proctor an exam, a Chapter board officer may serve as a proctor if that board member is not a currently approved applicant who is within the eligible period to take the exam. Proctor selections are subject to approval by the Certification Committee.

Availability of Program Representative

A representative of the Certification program will be available during each examination session to address technical or other issues as may arise.

Revision of Content

Content of the examination and the BOK will be reviewed periodically, and changes considered based on current trends in the profession. General changes to the content of the examination must be approved by a two-thirds vote of the Committee. Adjustments can be made to the examination question bank on an emergency basis, jointly by the Chair and Vice-Chair, should it be credibly alleged that content contained within the examination represents false information or that content may have been compromised, and subsequently ratified by a two-thirds vote of the Committee.

Elements of the certification program will undergo review at least every ten (10) years in which the core competency knowledge, skills, and abilities; program content; BOK; validation study and examination will be assessed.

Revision of Testing Instruments

Changes to the testing platform must be approved by a two-thirds vote of the Committee.

Testing opportunities

Testing will take place at the Annual Threat Management Conference (TMC), the Winter Conference (WC), and on additional dates selected by the Chapters, as below. Chapters may deliver the exam on dates of their choice subject to Committee approval. These dates must be submitted to ATAP Headquarters (ATAPHQ) 90 days in advance by a Chapter President and approved by the Certification Program. Testing hosted by a Chapter must comply with this policy guide, as well as protocols or guidelines for administering the exam which are provided by the Certification Program. Testing sessions hosted by the Chapters must be viewable on the Association website and must be available to any eligible and approved candidate on a first-come, first-served basis.

Each Chapter may offer up to two CTM exams per calendar year. This limit will not include regional Joint Threat Assessment Training conferences (JTAT) at which an exam is offered, as no single Chapter is responsible for a JTAT, though a Chapter President must still be the person requesting approval to hold a JTAT exam. Chapters may host concurrent seatings in different locations as part of a single, Chapter-wide session at a single date and time. Each location must meet current exam session requirements.

Retesting

If an applicant is unsuccessful in passing the examination, there is a mandatory waiting period of 180 days before a reattempt can be made. A candidate who fails the exam may test again on or after the 180th day following the prior attempt, with the sole exception being ATAP national conferences: a candidate who fails the exam at TMC or WC may test again during the next national conference, i.e., a WC or TMC. Candidates must pay the current testing fee for each attempt.

An approved application is valid for two years, as long as the first attempt was made within one year of application approval, during which time new applications for retests are not required. Following the elapse of two calendar years from the date of approval of an application, a candidate must reapply to the program.

Scheduling of Tests

Upon official approval to take or retake the examination, it is the candidate's responsibility to notify Certification Staff of the desired testing location and date. Staff will send confirmation of the date and time the candidate has been approved to sit for the exam, subject to registration maximums if any. Failure to follow this procedure will result in denial to sit for a particular exam despite being an approved candidate.

Rescheduling of Tests

Threat assessment and management professionals' schedules can be affected by emergencies. Candidates scheduled to take an examination but find themselves unable to attend will be given a second opportunity to test at no extra charge as long as the examination is completed prior to expiration of the approval period for that application (one year from date of approval if for the first exam attempt, or two years from the date of approval if a retest).

Reporting of Testing Results

The Association staff will notify the candidate of their score. A candidate must score a 75% or above to pass the exam. Candidates who pass will receive:

- Certificate of certification
- Letter of recognition
- Guidelines for maintaining certification

RECERTIFICATION

A CTM must recertify every two years to maintain CTM status. The recertification process will not require reexamination by the CTM, but it will require demonstrated professional development and continued involvement in the threat assessment and management community through:

1. Membership Activity
2. Volunteer Leadership
3. Publication
4. Education
5. Instruction

To maintain certification, a CTM must earn 50 credits over the two-year recertification period. Proof of credits towards recertification must be submitted to ATAP prior to the certification expiration date by the method specified by the Certification Committee. Activity values will be posted on the ATAP website and will not be changed without sufficient notice in the judgment of the Certification Committee.

It is solely each CTM's responsibility to recertify prior to the expiration date of certification regardless of whether a reminder was sent or received.

Biennial Recertification Window

A CTM's biennial recertification period is the normal, two-year period during which a CTM's credential is valid. A recertification application window is the span of time during which the CTM may apply for renewal.

The recertification window will open six months prior to expiration of the CTM credential and will remain open until the date of expiration. During this six-month period, applications to recertify will be accepted. Recertification prior to expiration will not cause subsequent expiration dates to advance on

the calendar. Activities may only be claimed for points during a CTM's *scheduled* biennial recertification period, regardless of whether they recertified early during the previous biennial period.

As clarifying example, consider the following:

- A CTM submitted a recertification application seven months prior to their recertification deadline. That application was rejected because the CTM's recertification window was not open yet. The CTM resubmitted their application five months prior to the deadline. That application was accepted and approved. The CTM's status was renewed for two years and five months.
- At the end of the following biennial period, the same CTM applied for their next recertification based on activities conducted during the entire two years and five months since the prior renewal. The activities which occurred during the five-month advance window are rejected because they are out-of-period; other activities are reviewed and approved if deemed acceptable.

Expiration and Extension

A certification is considered expired on the date of expiration and there are no extensions except as provided in this document. The Certification Program does not send reminders of expiration to CTMs. It is the sole responsibility of each individual CTM to be aware of in their expiration date and meet all requirements prior to expiration.

A CTM may renew their certification up to one year after expiration without reapplying if they have obtained prior approval by the Committee. In no case may an expired certification be renewed after the elapse of one calendar year.

For extensions granted on an individual basis, the same will only be provided if temporary duty orders are provided such as military orders or overseas temporary duty orders for an extended period, or proof of a medical condition that prohibits meeting recertification requirements.

A general extension may be granted to several or all CTMs by the Certification Committee in the event of extraordinary circumstances affecting the ability of significant numbers of CTMs to complete recertification points during a lengthy period, such as in the case of an extended pandemic or disaster.

Reporting Requirements

Proof of recertification credits must be submitted to the ATAP Certification Program via the approved method, generally on the online platform, prior to the expiration date of the certification. There will be a 60-day grace period from the certification expiration date to termination of certification for failure to provide proof of recertification. A late fee, specified on the Association website, will apply to recertification applications utilizing the grace period. The grace period does not change the expiration date of the credential or change the two-year biennial period.

Denial of credits by the Certification Committee will not form a basis for extension of time to submit additional activity for credits. Certified individuals must provide additional supporting documentation

verifying credits upon request. A Committee request for supporting documentation will not form a basis for extension of time to submit documentation or additional credits.

Deceptively representing activity for recertification credits will result in revocation of certification.

CONDUCT OF CERTIFIED THREAT MANAGERS

All CTMs must adhere to the ATAP Code of Ethical Conduct.

Except for members of the Certification Committee during internal discussion, no CTM or applicant who has taken the examination is permitted to discuss specific exam questions or content with any person, regardless of the certification status of either party.

No CTM may sell, market, provide paid endorsement, develop for financial compensation, or otherwise profit financially by receipt of income, gift, loan, or other valuable consideration, from a training course or event which is described, marketed, or advertised as constituting preparation, assistance, guidance, or otherwise purports to help participants pass the Certification Exam or obtain CTM status. Certified Threat Managers are responsible for taking affirmative steps to ensure no such advertising takes place for their business or academic endeavors.

A CTM wishing to engage in activity but unsure whether the above policy would apply, may request an advisory opinion from the Committee. A request for an advisory opinion must be submitted in writing to the Certification Committee via email to certification@atapworldwide.org and contain all the facts and circumstances the CTM wishes the Committee to consider. The request will be considered by a quorum of the Committee and a written response will be provided to the CTM within 60 days. A CTM should not submit a request asking the Committee to approve activity clearly prohibited by this policy; rather, this is intended to be available for situations in which the policy's applicability is unclear to the CTM. There will be no right to appeal the Committee's guidance.

Separately, the Certification Committee discourages, but does not prohibit, CTM participation in certification study groups, such as but not limited to informal groups organized at the ATAP chapter level. A CTM who elects to participate should remain mindful of the potential for impropriety, or even the appearance thereof, if [a] potential exam questions or [b] the relative importance of specific Body of Knowledge resources are discussed. A CTM must avoid participating in any discussion that draws on their knowledge of the content of the exam in any way.

SUSPENSION OR REVOCATION OF CERTIFICATION

Certification will be revoked in the event of a CTM's failure to recertify as provided within this policy.

Suspension or revocation of certification is a potential outcome of a disciplinary proceeding against a CTM, as provided within this policy.

DISCIPLINARY ACTION

For the purposes of this section, Disciplinary Action, the term “complaint” is defined as both those allegations of inappropriate conduct that are formally brought forth by third parties, as well as concerns of inappropriate conduct that are revealed to Certification Committee members through observations or interactions with others.

Jurisdiction

The disciplinary jurisdiction of Certification Committee is limited to issues related to applicants or CTMs, for example, allegations that a CTM or applicant engaged in, or caused or facilitated others to engage in, misconduct.¹

At its sole discretion, the Certification Committee will accept, investigate or act upon a complaint made to the Association SAA or the Certification Committee Chair only as it pertains to an applicant’s or CTM’s alleged or apparent misconduct, regardless of whether there may be another means of redress or resolution under state, federal, or international law, in either the civil or criminal courts, or before a law enforcement agency, administrative tribunal, or employer or institution or some other person or entity. However, if the conduct alleged as the basis of a complaint was already disclosed to the Certification Committee at the time of application and the Committee decided not to act, it will not take up the matter anew later unless new information is presented or available.

The Certification Committee will generally not investigate or adjudicate a complaint for which there is potential redress or resolution in another forum and the issues do not align with precepts of the ATAP Code of Ethical Conduct. Such determination shall be made by the Certification Committee in its sole discretion. The decision not to investigate or adjudicate such complaints is not subject to appeal. In addition, the Certification Committee will not accept, investigate, or act upon complaints that in the Certification Committee’s sole discretion it determines are impracticable to investigate, duplicative, or are determined to have been filed for personal reasons rather than issues directly regarding certification.

Complaints alleging misconduct by an ATAP member, for which any member of ATAP may be sanctioned, will be referred to the Association Ethics Committee for resolution in relation to membership status or other issues within the Ethics Committee’s jurisdiction. Complaints that allege misconduct by a current applicant or CTM, whether an ATAP member or not, will be referred to the Certification Committee for resolution as it pertains to the status of the person’s application or certification. Results of any investigation and any findings or decisions related to a person’s application or CTM status will be provided to ABOD by the Certification Committee Chair.

In the case of complaints involving an ATAP member who is also a CTM, given the joint jurisdictional elements, it is in the best interest of both the Association Ethics Committee and the Certification Committee to investigate the alleged or apparent misconduct jointly, when possible, in an attempt to

¹ Such as but not limited to apparent violations of the ATAP Code of Ethical Conduct, a falsified application to the certification program, fraud in procuring any certification, cheating on any certification examination, violation of criminal law.

lessen the burden of the process on the individual alleged to have engaged in misconduct. This would generally mean that the Association SAA or designee would work with a designated representative of the Certification Committee to conduct joint interviews of appropriate parties and share documentary evidence, even though they will be conducting separate analysis of this evidence and each Committee will reach its own determination regarding findings and outcomes.

Conflicts of Interest

No Certification Committee member will be involved in any disciplinary proceeding (except as a witness) in which they have a close personal relationship, family relationship, or a business or financial stake in or with either party or in the outcome of the proceeding.

No Certification Committee member will serve on more than one subcommittee in the same proceeding involving the same parties. Thus, for example, when a committee member serves as on the Ethics/Disciplinary Subcommittee, that member may not also sit on a Board of Review on the same matter. It is not a conflict to serve as the investigator and participate in decision-making as a member of the Ethics/Disciplinary Subcommittee; such member will remain unbiased and provide a thorough report of the investigation to the remaining members of the Ethics/Disciplinary Subcommittee.

Process for Filing a Complaint Regarding a Certified Threat Manager or Applicant

Any person may submit a complaint to the Association SAA or the Chair of the Certification Committee. Complaints directed to the Chair of the Certification Committee must be made according to the following procedure:

A complaint must be in writing by completing and submitting the online complaint form found at <https://www.atapworldwide.org/page/ctmcomplaint>. The complaint as well as any accompanying documentation must be in English.

A complaint must fully identify the person(s) making the complaint (the “complainant”); neither the Association SAA or the Chair of the Certification Committee will accept or act upon anonymous complaints.

A complaint must also include the name of the person who is the subject of the complaint (the “respondent”), with as much identifying information as is available (e.g., other names by which the respondent may be known or have used, address, employer, email address, telephone number, etc.) A complaint that does not identify the person who is the subject of the complaint will not be accepted or processed.

A complaint must include a reasonably detailed description of the alleged misconduct (e.g., specific

violation of the ATAP Code of Ethical Conduct, crime, etc.).

A complaint should also include as much documentary or other evidence that is available to the complainant under the circumstances.

Initial Screening of Complaints

The Association SAA, if the one first notified, will first contact the Chair of the Certification Committee to ascertain whether the subject of the complaint is a CTM or applicant. If the Chair of the Certification Committee is the first one notified of a complaint against a CTM who is also an ATAP member, the Chair will contact the Association SAA to provide notification of the complaint.

Review by Association SAA

When a subject of a complaint to the Certification Chair is also an ATAP member, the SAA in consultation with the Chair of the Association Ethics Committee will preliminarily review the complaint to determine if it contains adequate information to identify a subject and describes a potential violation of the ATAP Code of Ethical Conduct or other conduct under the purview of the Association Ethics Committee with sufficient detail to enable investigation. If this review determines the complaint is insufficient, has no merit, or is not within the purview of the Association Ethics Committee, it will be dismissed as to action by the Association SAA with no further action or investigation and the person filing the complaint will be notified of its dismissal. The notification may include a brief statement of the reason(s) why the complaint was dismissed and may bar the complainant from submitting additional complaints regarding the same alleged violation if such action is deemed justified. If this review determines a complaint does contain sufficient detail, appears to have merit and is within the purview of the Association Ethics Committee, it will go forward as per determined by that committee's process.

Review by Certification Program

If the person is a CTM or certification applicant, regardless of any findings and action taken by the Association SAA or Ethics Committee, the Ethics/Disciplinary Subcommittee of the Certification Committee will conduct its own analysis regarding whether it will proceed with an investigation related to the individual's certification or application. If a review determines that a complaint regarding a CTM or applicant was made in bad faith by an ATAP member, a separate complaint may be initiated by the Certification Committee to the Association SAA against the complainant. If a review determines that a complaint regarding a CTM was made in bad faith by another CTM, a separate complaint may be initiated against the complainant by the Ethics/Disciplinary Subcommittee.

If it is determined that a complaint has no merit or arises out of the same facts and circumstances as a previously resolved complaint or other process or procedure or other appropriate grounds before the Certification Committee, it will be dismissed and the parties will be notified of that fact.

Process for Investigating and Deciding Complaints

Complaint Sufficient to Proceed to Investigation

If the Ethics/Disciplinary Subcommittee determines a complaint should go forward, it will notify both the complainant, if any, and the respondent of that fact. If possible and appropriate, notice should be sent within 30 days of making the decision to go forward with the complaint. At that time, an investigation will commence.

The Notice Will Include the Following:

- A copy of the complaint or a full and accurate statement of the allegations or information of potential misconduct;
- A copy of the policy related to conducting investigations of complaints;
- The name(s) of the person(s) designated by the Ethics/Disciplinary Subcommittee assigned to investigate the allegations or information;
- Notice to inform the Ethics/Disciplinary Subcommittee of any objection to the investigator(s) (generally on the basis of conflict of interest);
- An invitation to the respondent to contact the investigator(s) with any relevant and material information responsive to the complaint;
- Notice that the investigator(s) may be contacting the complainant and respondent.
- The notice will be in writing and sent via e-mail;
- A stated expectation that during this process neither the complainant(s) or the respondent will initiate direct or indirect contact with the other party while the matter is being investigated and adjudicated and should this expectation be breached then this information will be incorporated into the investigation and the outcome decision;
- A statement that the complainant and respondent are expected to keep confidential the complaint, all communications, and other materials related to the complaint and investigation and should this confidentiality be breached, the breaching party may be subject to disciplinary proceedings; and
- A statement advising the complainant and respondent that at any point in the process, the Ethics/Disciplinary Subcommittee reserves the right to dismiss the complaint with or without prejudice.

Investigation and Resolution

The Chair of the Ethics/Disciplinary Subcommittee will designate the individual(s) to investigate the complaint. The Chair may designate him- or herself. These investigators typically would include two members of the Ethics/Disciplinary Subcommittee in the case of a non-ATAP member CTM, or one member of the Ethics/Disciplinary Subcommittee and the Association SAA, if the complaint involves an ATAP member who is also a CTM. The investigator(s) will report their findings to the Ethics/Disciplinary Subcommittee.

This initial investigation should be conducted as promptly and expeditiously as possible, ideally within 90 days. However, the investigator(s) will have as much time as is reasonably necessary to conduct a fair,

thorough, and impartial investigation. The investigator(s) should report to the Ethics/Disciplinary Subcommittee at least every 30 days, but more frequently as the investigators deem advisable.

All CTMs and applicants are required to fully cooperate in the investigation, if requested to do so, including respondents (subject) of the complaint. Refusing to do so can end the investigative and disciplinary process and lead to revocation of certification or disqualification from becoming certified. At any point during the investigative or disciplinary process, any CTM who is a subject of a complaint can voluntarily relinquish their certification or accept disciplinary sanction(s) by consent.

At the conclusion of an initial investigation, the Ethics/Disciplinary Subcommittee will make a preliminary determination as to whether the imposition of discipline may be an outcome in the matter. If discipline may be an outcome, a hearing will be held.

In either case, the parties will promptly be notified of the decision made by the Ethics/Disciplinary Subcommittee and any appeal rights.

Procedure for Hearings

A quorum of the Ethics/Disciplinary Subcommittee of at least three members will conduct a hearing.

Members of the Ethics/Disciplinary Subcommittee will disclose prior to the hearing whether they have any personal, family, financial or business interest or stake in any party or witness or in the outcome of the hearing. If so, that person will be disqualified from serving at the hearing. Participation in the investigation as a factfinder is not a disqualifier.

Within 30 days following a determination that a hearing will be held, the Chair of the Ethics/Disciplinary Subcommittee will send to the complainant, if any, and to the respondent a notice containing the following information, where applicable:

- The names of the Ethics/Disciplinary Subcommittee serving on the matter.
- An invitation to either party to make an objection to any member of the subcommittee participating in hearing the matter, which objection normally must be based on some conflict of interest or bias which disqualifies them from hearing the case. The invitation will specify the method of response (e.g., email, etc.), and an objection must be made no later than 11:59 p.m. Pacific Time on the seventh calendar day following initial notification of the names of individuals on the subcommittee.
- Copies of the ATAP Code of Ethical Conduct and any appropriate policies or procedures.
- Copy of the complaint (or complete, accurate statement of the allegations).
- A notice of the date, time of day, location, and format of the hearing (including through remote communications), which shall not be fewer than 15 days from the date of notice.
- Notice that either party, or members of the Ethics/Disciplinary Subcommittee, may present witnesses and other evidence; may cross-examine witnesses; may be represented by legal counsel;

and that either party may also be asked to testify by members of the Ethics/Disciplinary Subcommittee.

- Notice that as part of ATAP, a nonprofit, voluntary professional membership organization, the Ethics/Disciplinary Subcommittee cannot compel testimony or the production of evidence and lacks subpoena power.
- Notice that if the date, time of day and/or location, if any, of the hearing is inconvenient, either party may request alternative times, dates, etc., but the Ethics/Disciplinary Subcommittee will be under no obligation to make any changes.
- Notice that failure to cooperate with or participate in the hearing is a violation of Certification Program policy, and, in addition, may result in dismissal of the complaint or a finding of a violation on the underlying complaint.

Rules of procedure and evidence that would apply in a court of law will not apply to hearings conducted before the hearing body. Although not required, a verbatim record of the hearing may be made by the hearing body and, if made, will be the official record of the proceeding. This may be a digital recording or a transcript. If such a recording is made, any party may have a copy, but at the party's own expense. Other than this official record, no one may personally or individually, by him or herself or through any other person, record, transcribe or film the hearing.

The standard of proof is "preponderance of the evidence," that is, the hearing body concludes that there is a greater than 50% probability or likelihood that the alleged misconduct did occur.

The hearing body may seek advice and/or assistance of Association legal counsel regarding the conducting of the hearing, but ATAP legal counsel will not serve as proponent or advocate for either party nor have decision-making authority at the hearing.

If a party or witness in or to a hearing fails to appear, either in person, via telephone, videoconference or other means allowed by the hearing body; or if any party or witness fails to cooperate in the hearing by, for example, refusing to affirm that their testimony is true, by withholding evidence, or by refusing to answer questions; then the hearing body may make whatever findings, may draw any conclusions or inferences, and/or may take any actions (or refrain from taking any actions) that it deems fair, just and equitable under the circumstances such as, for example, calling a recess, re-scheduling the hearing, allowing a witness to testify without making affirmation of true testimony, drawing negative inferences from a person's refusal to cooperate, dismissing some, any or all of the allegations in the complaint or finding that some, any or all of the allegations against the respondent have been sustained.

Within 30 days after the conclusion of the hearing, the hearing body will render a written decision stating, at a minimum, the allegations made, the issues presented, the hearing body's findings of fact, the hearing body's decision and their reasons for the decision, and discipline, if any. The final, written decision will be sent to the parties within 10 days of its completion. This decision will be submitted to the ATAP Association President, though the President will not have the authority to change the decision of the hearing body.

Disciplinary Options

The Ethics/Disciplinary Subcommittee may impose any discipline on the respondent it deems just and proportionate under the circumstances, including, but not necessarily limited to:

- Private written censure
- Suspension of CTM status
- Revocation of CTM status
- Any other remedy that the Subcommittee determines is fair, just, equitable, and proportionate to avoid or deter the same or similar conduct in the future.

In furtherance of serving the public's interest as articulated in this policy guide, disciplinary actions will be posted on the Certification Program page of the Association's website.

APPEALS

Denial of Application

Candidates may appeal an original denial of an application to the program. Interim rejections of individual workflow steps in the online application management platform may not be appealed, as they are not denials of an application.

An appeal must be submitted in writing to the Certification Committee Vice-Chair and contain all facts and circumstances the appellant wishes the Committee to consider. Appeals must be emailed to certification@atapworldwide.org or post-marked to ATAPHQ at the address provided on the ATAP website no later than 11:59 p.m. Pacific Time on the 30th calendar day following notification to the candidate of the application denial. Appeals will be evaluated by a quorum of the Certification Committee. A written response will be provided within 60 days of submittal. The appeal will be conducted based entirely on the application and written appeal communication; no hearing will be held.

Examination Failure

Candidates may appeal a failed examination score where the basis of appeal is that the Certification Program did not follow its procedures during the examination and that this failure resulted in an egregious error that related directly to the candidate's failed examination score. An appeal must be submitted in writing to the Certification Committee Vice-Chair and specifically articulate the procedure(s) which were not followed, the resulting egregious error, and how that error relates to the Candidate's failed examination score. Appeals must be emailed to certification@atapworldwide.org or post-marked to ATAPHQ at the address provided on the ATAP website no later than 11:59 p.m. Pacific Time on the 30th calendar day following notification to the candidate of the examination failure. Appeals will be evaluated by a quorum of the Certification Committee. A written response will be provided within 60 days of submittal. The appeal will be conducted based entirely on the written appeal and factual findings related to the examination procedures; no hearing will be held.

Disciplinary Action

Any party aggrieved by any decision of the Ethics/Disciplinary Subcommittee will be entitled to one level of appeal to a three-member panel appointed by the Chair of the Certification Committee. This panel will be called the Board of Review and will consist of Certification Committee members who did not participate in the investigation or disciplinary decision related to the alleged or potential misconduct. An appeal of disciplinary action must be filed in writing with the Chair of the Certification Committee no later than 11:59 p.m. Pacific Time on the 30th calendar day following notification of the final decision of the Ethics/Disciplinary Subcommittee.

Ordinarily, an appeal from the decision will consist of a review only of the written record in the proceedings, if any. However, any party may ask to present new information or evidence not previously available at an appeal hearing, though the Board of Review has no obligation to grant such a request. The Board of Review may allow for the submission of additional evidence and may take testimony from witnesses, whether the witness testified in the original hearing or not, on some, any, or all the issues in the case, though it shall not be obliged to do so. The Board of Review may also allow oral presentations by the parties. The Board of Review may limit the issues to be discussed and the time allowed for the presentations.

An appeal at which additional evidence or testimony is invited, allowed, accepted, or taken, however, shall normally be an extraordinary exception to the norm. In no case may any party attempt to use the right to appeal a decision to frustrate, delay or circumvent the normal procedure. A party may be required to show compelling reasons why it should be allowed to present any additional information, testimony, or witnesses at the appellate level, including an explanation of why this additional information was not provided earlier in the processing of the complaint.

The Board of Review may accept, reject, or modify the case disposition, or return the case for rehearing. In no circumstance may the Board of Review impose more severe sanctions than those imposed by the Ethics/Disciplinary Subcommittee.

The Board of Review will issue its decision and notify the parties as promptly as possible. Board of Review decisions are final and are not subject to further appeal.

CONFIDENTIALITY

Certification Program Security

Content of the program as well as candidate information will be protected. Candidate information that includes unpublished personally identifying information and pass/fail scores of the candidate are sensitive information. Only committee members and appointed association management company staff, determined by the Chair to require such access, will be privileged to access this material. The remainder of the committee will have access to individual scoring or other data only as necessary to complete specific committee tasks.

The actual content of the program which includes any unpublished material such as test question bank items, scoring systems, and program administration is also limited-access information and is only accessible by the active members of the committee. The Association President may be briefed on this information with the exception of test question bank items, whether or not certified.

NON-DISCRIMINATION POLICY AND AMERICANS WITH DISABILITIES ACT

The Certification Program will conduct all activities in compliance with the ATAP antidiscrimination policy.

ATAP will offer its certification program in compliance with the Americans with Disabilities Act specifically with Section III-4-6000 Examinations and Courses which requires hosting “examinations or courses in a place and manner accessible to persons with disabilities or offer alternative accessible arrangements for such individuals.” ATAP will attempt to perform all testing in a manner that does not discriminate against disabled individuals.

Applicants must notify the Certification Program of disabled status, with sufficient specificity as to allow reasonable accommodation planning to occur, as soon as practicable during the pre-examination period. Such notice must include documentation of the existence and nature of the diagnosis and resulting disability necessitating accommodation, signed by a treating medical doctor or other treating qualified health care professional.

Facility Access

ATAP will ensure that facilities utilized for testing meet ADA requirements when notification has been provided by a candidate.

Alternative Format Testing

Should a candidate require alternative testing such as brail tests or study materials, ATAP will provide examination materials in appropriate alternative formats when required. ATAP is not obligated to provide publicly produced materials (such as published books, periodicals or other published materials) in alternative formats. ATAP will provide title, author and publisher of the materials to help candidates access the desired format.

ANTITRUST

Elements of the certification program to include standards, testing/examination, qualifications, and procedures shall be based upon appropriate technical and industry guidelines and shall not be based upon any effort to unreasonably reduce or eliminate competition in the provision of qualified services. The Certification Committee will fairly evaluate all candidates based on similarly established standards.

COMMUNICATIONS

The primary means of communicating with CTMs and applicants will be via electronic mail. It is the responsibility of each CTM and applicant to keep the Certification Program updated with correct contact information including email, address, and telephone contact information; it is not sufficient to update ATAP membership records with this information. The email address for the Certification Program is certification@atapworldwide.org. Program participants should not use committee members' or staff members' direct email addresses for program matters.

ACRONYMS

ABOD: Association Board of Directors

ATAP: Association of Threat Assessment Professionals

ATAPHQ: ATAP Headquarters

BOK: Body of Knowledge

CAS: Candidate Assessment Subcommittee

CTM: Certified Threat Manager

SAA: Sergeant at Arms

TAP: Global term for the worldwide Associations of Threat Assessment Professionals aligned with ATAP

TMC: Threat Management Conference

WC: Winter Conference