

October 13, 2003

Rhonda Williams, RN, MA, RG-NGF  
President, National Guardianship Association  
409 E. Forrest Hill Ave.  
Peoria, IL 61603-1141

Re: Audit results and recommendations

Dear Ms. Williams:

This letter contains the results of the audit performed on the National Guardianship Foundation's Registered Private Guardian Certification and recommendations for improving the certification process. I appreciated the opportunity to work with you and look forward to working with you in the future. Please let me know if you have any questions about the report.

Respectfully,

Judith A. Hale, Ph.D., CPT  
Hale Associates  
9s211 Graceland Street  
Downers Grove, IL 60516

Attachments: Audit Report  
Completed Audit Checklist

# **Audit Report**

## **Findings and Recommendations**

### **October 8, 2003**

#### **Overview**

The audit included reviewing documents and interviewing Rhonda Williams and Susan McMahon. The interview occurred on October 8, 2003. Prior to the audit, Rhonda and Susan were given a copy of the Certification Audit Checklist to help them prepare. At the time of the interview they were given a copy of a form to document every aspect of the design and administration of a test. They were sent a job aid that included standards for developing multiple-choice items and a sample item analysis report.

#### **Findings**

The foundation has a clear sense of purpose for its certification. The process used to derive the eligibility requirements and the decision to base the test on the Standards and Code of Ethics adopted by the Association are sound. The test administrative procedures seem complete.

The opportunities for improvement are in the areas of item analysis, criticality analysis, behavioral objectives, and item writing standards.

#### **Recommendations:**

1. Arrange for an item analysis to be done of previously offered exams and of future offerings.

Rationale: An item analysis will identify questions that do not discriminate people who know the standards on which the exam is based from those who do not. It will identify items that are exceptionally easy and difficult. This information can then be used to eliminate or rewrite poor questions and their distracters.

2. Conduct a criticality analysis to determine how much weight to give or what percentage of the exam should be devoted to each major content area covered by the exam (standard and rule).

Rationale: Determining the criticality of each content area is required under the Title VII of the Civil Rights Act of 1964 and the Uniform Guidelines on Employee Selection Procedures. The procedures state that the content validity of a test

must include the relative importance of the job behaviors. This has been interpreted to mean that the number of questions devoted to a topic area should reflect the criticality of the topic. Determining the criticality of each topic area (standard and rule) will also help assure future iterations of the test sample the content in the same proportion as previous tests.

3. Develop a test blueprint based on the criticality analysis. A test blueprint documents how many and what type of questions for each content area (standard or rule) are to be contained in every test.

Rationale: A test blueprint is a key document for assuring every test samples the content areas to the same proportion. A test blueprint helps you decide how many questions to ask about each content area. This, in turn, will help you decide on the optimal overall length of the test.

4. Adopt standards for creating multiple-choice items.

Rationale: Standards exist for multiple-choice items. The standards are based on psychological studies about how the brain processes information. The standards help reduce what is known as “construct” error, or errors because the test taker attention is on how to interpret the question instead of seeking the correct response.

5. Identify the standard, rule, and learning objective every item addresses.

Rationale: Knowing what standard or rule each question addresses when combined with the results of the item analysis will tell you how well candidates in general know each standard and rule. This information can be used to direct the development or enhancement of educational materials used for preparation and renewal. Currently it is possible for a candidate to pass the test, yet incorrectly answer every question related to specific standards or rules.

6. Consider dividing the test into sections by standard or rule and setting a pass score for each section.

Rationale: Setting a pass score for each section will assure candidates who pass have demonstrated the required minimum level of proficiency for each content area.

## **Audit Results**

The specific results of the audit appear on the following forms.



**Certification Checklist**  
**Governance**

Desired Elements Exist	Yes	No
A body should be established to oversee the certification and assure it fulfills the expectations of the organization. Documentation includes:	Y	
Oversight: <ul style="list-style-type: none"> <li>• Who reviews the certification standards, criteria, and administrative procedures.</li> <li>• How frequently accumulative scores are reviewed.</li> <li>• How frequently performance criteria are reviewed.</li> <li>• How frequently preparation materials are reviewed.</li> <li>• How often liability and compliance issues are reviewed and non-bias safeguards are considered and implemented.</li> <li>• The link between the certification program and the performance management system/compensation system.</li> </ul>	Y NA NA NA NA NA	
Who is responsible for the governance of the program. The make up of the Board. How often they meet. How the certification is administered (policies and procedures).	Y	
On what basis the certification program will be measured and evaluated. Note: there should be plans to correlate certification results with achievement of the business or performance goals.	N Y	
Criteria and process for candidates to appeal or request a review including: <ul style="list-style-type: none"> <li>• Directions to candidate on how to appeal or request a review: <ul style="list-style-type: none"> <li>➤ How much time they have.</li> <li>➤ To whom they submit their request.</li> <li>➤ In what form they submit their request.</li> </ul> </li> <li>• The appeals process: <ul style="list-style-type: none"> <li>➤ How many levels there are.</li> <li>➤ Who makes up the appeal Board.</li> <li>➤ On what basis they were selected.</li> <li>➤ How long they have to respond to a request for a review.</li> <li>➤ In what form they respond.</li> <li>➤ How appeals are considered by the Board.</li> <li>➤ Who has the final say.</li> </ul> </li> </ul>	Y	
Re-certification requirements and protocols.	Y	
Who has sign-off authority regarding governance issues.	Y	

***Certification Checklist***  
***Administration***

Desired Elements Exist	Yes	No
Procedures are tested and in place for:	Y	
Informing target audience of availability/advisability of process.	Y*	
How candidates ask to participate.	NA	
How candidates are informed of the process.	Y	
Site and staff selection for administration of each offering of the test.	Y	
Procedures for distribution of materials and maintenance of process integrity (i.e., guards against test compromise, if needed).	Y	
Test conditions for candidates such as time to complete, use of materials, and kinds of interaction allowed.	Y	
Guidelines for administering the test.	Y	
How consistency across offerings is maintained.	Y	
How equivalency across offerings is maintained.	Y	
How candidates are notified of their score.	Y	
What the policy is if the candidate does not pass.	Y	
How many times candidates can attempt certification.	Y	
What information (if any) is placed in the candidate's personnel file or what information is maintained in the candidate's file.	Y**	
Who gets a candidate's test results.	Y***	
What decisions or actions are taken based on the test results.	NA	

\*Communication with candidates is through Affiliate and Association newsletters.

\*\*Candidates' files include Demographics, date passed, date of renewal plus the application

\*\*\*Only the candidate sees the results unless the candidate authorizes the results be sent to another party.

**Certification Checklist**  
**Job Analysis**

Desired Elements Exist	Yes	No
A job or task analysis was done. The job/task analysis included getting input from people who do the job/task, supervisors, customers, and others dependent on or vested in the quality of the job/task's output. Documentation includes:	N	
The job/task(s) the certification supports (target audience).	Y*	
Which tasks will be assessed/considered part of the certification.	Y	
<ul style="list-style-type: none"> <li>• Who decided what tasks the certification should address.</li> <li>• On what basis the target audience was chosen.</li> </ul>		
How the job/task analysis was done.	Y**	
<ul style="list-style-type: none"> <li>• Documents and records searched and verified.</li> <li>• Sources used (i.e., DOL).</li> <li>• How many people observed.</li> <li>• On what basis they were selected.</li> <li>• How many people were interviewed.</li> <li>• On what basis they were selected.</li> <li>• How many people were surveyed.</li> <li>• On what basis they were selected.</li> <li>• Other data gathering methods used.</li> <li>• On what basis tasks were classified (importance, difficulty, frequency).</li> </ul>		
The method used for the job/task analysis, including design, data collection, analysis, and results/recommendations.	Y	
The recency of the job/task analysis.	Y	
Who has sign-off authority and accountability for the results of the job or task analysis and that the tasks selected are required for competent performance. Note: this should not be the same people who conducted the job analysis and it should include a broad representation of people (geographic, racial, ethnic, length of service, practitioners, supervisors, etc.).	Y	

\* The exam is based on the standards and code of ethics adopted by the Association.

\*\*1. Standards adopted by Assn 2 panel of experts created survey 3 surveyed members (94) 4. panel of experts reviewed survey results

***Certification Checklist***  
***Job/Task Descriptions and Performance Statements***

Desired Elements Exist	Yes	No
<p>The task list is converted into performance statements. Each statement somehow provides:</p> <ul style="list-style-type: none"> <li>• Conditions under which the performance takes place.</li> <li>• The performance as an action/activity.</li> <li>• Criteria that can be used to document accomplishment of the performance.</li> </ul> <p>Documentation includes:</p>	N*	
<p>The list of task statements or descriptions.</p> <p>The list of performance statements including:</p> <ul style="list-style-type: none"> <li>• The conditions or givens based on: <ul style="list-style-type: none"> <li>➤ Inputs, requests, directives, etc.</li> <li>➤ Desired business outcomes or the desired end state.</li> <li>➤ Availability and access to aids, equipment, information.</li> </ul> </li> <li>• The performance itself.</li> <li>• The criteria or what will be accepted as evidence of proficiency (at different levels if appropriate).</li> </ul> <p>How the task statements were converted into performance statements with criteria.</p> <ul style="list-style-type: none"> <li>• Who participated in the development of the task statements or descriptions, performance criteria, and performance levels (if appropriate): <ul style="list-style-type: none"> <li>➤ Authorities in the discipline.</li> <li>➤ Exemplary practitioners.</li> <li>➤ Clients, customers, or users of outcomes.</li> <li>➤ Technical staff (experts in developing performance statements).</li> </ul> </li> <li>• On what basis the people were selected.</li> </ul> <p>What process was used to review and validate the:</p> <ul style="list-style-type: none"> <li>• Task statements or descriptions.</li> <li>• Performance criteria.</li> <li>• Performance levels (if appropriate).</li> </ul>		

\*Behavioral statements were and continue to be created during the item writing process, but are not documented.

***Certification Checklist***  
***Job/Task Descriptions and Performance Statements (Continued)***

Desired Elements Exist	Yes	No
Documentation includes:	NA*	
<p>What information, guidelines, equipment, or materials the person doing each task normally has access to when performing the task.</p> <p>Who has sign-off authority and is accountable for confirming performances:</p> <ul style="list-style-type: none"> <li>• Are clearly stated.</li> <li>• Have measures or criteria.</li> <li>• Match the results of the job analysis.</li> </ul> <p>Procedure for updating and maintaining the job/task descriptions in the future to incorporate changes (new technology, performance measures, procedures, rules, etc.).</p>		

\*The test covers the standards and code of ethics (principal based) in terms of how they manifest when confronted with typical decisions, situations, and dilemmas.

***Certification Checklist***  
***Test Design & Development***

Desired Elements Exist	Yes	No
If the certification requires successful completion of a test either as a prerequisite or as part of the certification, the test should match the test specifications. Documentation should include:		
<p>Test specifications:</p> <ul style="list-style-type: none"> <li>• List of performances or content areas to be tested. (STANDARDS) <span style="float: right;">Y</span></li> <li>• Sequence in which they will be tested. (RANDOM) <span style="float: right;">NA</span></li> <li>• How many opportunities (by performance and level) each exam will give the candidate to demonstrate proficiency. (100 QUESTIONS) <span style="float: right;">Y</span></li> <li>• How each performance will be tested. <span style="float: right;">Y</span> <ul style="list-style-type: none"> <li>➤ Multiple-choice. (ALL MULTIPLE-CHOICE)</li> <li>➤ Matching.</li> <li>➤ Short answer.</li> <li>➤ Essay.</li> <li>➤ Oral.</li> <li>➤ Performance.</li> </ul> </li> <li>• How many parts there are to the test. <span style="float: right;">NA</span> <ul style="list-style-type: none"> <li>➤ The recommended or required order of each part.</li> <li>➤ The amount of time the candidate has to complete the test or each part of the test.</li> </ul> </li> <li>• The rationale for the type of testing procedure selected. <span style="float: right;">Y</span></li> <li>• How many questions there are for each content area, performance, and level. <span style="float: right;">N</span></li> </ul> <p>What information, guidelines, equipment, or materials the candidate will have access to and can use during the test. <span style="float: right;">NA</span></p> <p>Who developed the test specifications and on what basis the people were selected. <span style="float: right;">Y</span></p> <p>The procedures for administering and scoring the test. <span style="float: right;">Y</span></p> <p>Who has sign-off authority and accountability for the design of the test and that the test specifications and format reflect the results of the job analysis. <span style="float: right;">Y</span></p>		

***Certification Checklist***  
***Test Design & Development, Continued***

Desired Elements Exist	Yes	No
If the certification requires successful completion of a test either as a prerequisite or as part of the certification, the test should match the test specifications. Documentation should include:		
How each test question and performance situation links to the test specifications:		
<ul style="list-style-type: none"> <li>• Each question is coded to reflect the content area, performance, and level.</li> </ul>	Y*	
<ul style="list-style-type: none"> <li>• Each question is coded or referenced to material that confirms the correct response.</li> </ul>	N	
<ul style="list-style-type: none"> <li>• Each question is coded to reflect when and how often it has been used.</li> </ul>	Y	
<ul style="list-style-type: none"> <li>• Each question is coded to show the correct answer.</li> </ul>	Y	
The standards any multiple choice items used must satisfy.	N	
The standards any matching items used must satisfy.	NA	
The standards any juried items used must satisfy.	NA	
The standards any performance items used must satisfy.	NA	
The general standards used, i.e.,	NA	
<ul style="list-style-type: none"> <li>• A segment is included to orient the candidate to the requirements of the test.</li> <li>• Purpose and objective of the test are clear.</li> <li>• The scoring procedures are clear</li> <li>• Candidates are given a complete set of instructions on what to do.</li> </ul>	Y	
Who has sign-off authority and accountability for confirming the test elements conform to standards and match the test's specifications.	Y	

\*Questions are coded to a standard

**Certification Checklist**  
**Test Administration**

Desired Elements Exist	Yes	No
Since inconsistent test administration can be a source of bias, procedures should be developed and followed to assure consistent and fair administration. Documentation includes:	Y	
Prerequisites:		
• What prerequisites (if any) the candidate must satisfy before testing.	Y	
• Who decided what the prerequisites are and on what basis the people who made this decision were chosen.	Y	
Jurors:		
• The criteria jurors must satisfy to become jurors.		NA
• Who decided on the criteria and on what basis the people who decided on the criteria were chosen.		
• How jurors are trained.		
Forms and equipment:		
• Directions given to candidates prior to and during the testing process on what to do and how proficiency will be determined.		NA
• Any forms candidates must complete prior to taking the test.		
• The forms used to record candidates answers or responses.		
• Performance checklists used by jurors to score performance.		
• Checklists used to judge short answer or oral answers.		
• List of required equipment and materials.		
Administration:		
• Instructions or scripts used by test administrators.	Y	
• Instructions given to the candidate when the test is administered electronically or as part of a self-administered test booklet.		
• Instructions to jurors about how to complete the checklists.		
• Guidelines on how to accommodate disabilities.		
Test Security:		
• Who has authority to review the test items.	Y	
• Who has access to the test items and item analyses results.		
• Who has authority to review individual and accumulative scores.		
Who has sign-off authority and accountability for confirming test administration procedures exist and are followed.	Y	

*Certification Checklist*  
*Test Analysis*

Desired Elements Exist	Yes	No
Tests should be piloted to confirm the instructions, test items, and checklists work as designed. An item analysis should be done after each offering to identify any items that need to be reviewed, modified, or eliminated. Documentation should include:	Y	
Pilot: <ul style="list-style-type: none"> <li>• The criteria used to select candidates for the pilot.</li> <li>• Who decided who would make up the pilot group and on what basis the people who made this decision were chosen.</li> <li>• The number of people who participated in the pilot.</li> <li>• The pilot group's test scores.</li> <li>• Who observed and debriefed the pilot group after they completed the test.</li> <li>• Composition of the people used to set the pass score.</li> </ul> How the test is scored.	Y*	
Pass score: <ul style="list-style-type: none"> <li>• How the pass score was determined.               <ul style="list-style-type: none"> <li>➤ Contrasting group.</li> <li>➤ Angoff-Nedelski.</li> <li>➤ Expert opinion.</li> </ul> </li> <li>• What the pass score is.</li> </ul>	Y**	
Item analysis: <ul style="list-style-type: none"> <li>• How the item analysis is performed.</li> <li>• Who performs the item analysis.</li> </ul>	Y	
Who has sign-off authority and accountability for assuring the test is and remains valid and reliable.	N***	
Who has sign-off authority and accountability for assuring the test is and remains valid and reliable.	Y	

\*Pilot used to set the pass score.

\*\* Expert opinion was used.

\*\*\* An item analysis has not been done, arrangements are being made to do this.

*Certification Checklist*  
*Performance Elements*

Desired Elements Exist	Yes	No
<p>When the certification requires demonstration of performance either on the job or in a simulated environment, the observer who attests to the adequacy of the performance should be qualified to do so. The documentation should include:</p>	NA	
<p>Standards for performance items, e.g.,</p> <ul style="list-style-type: none"> <li>• Item directions are clear.</li> <li>• Actions must be observable</li> <li>• All required steps are listed.</li> <li>• Critical and sequential steps are identified.</li> <li>• If a process, the activities are in the order in which they must occur.</li> <li>• If required to draw or label items, the items to be labeled must be clearly identified and there can only be 1 correct term for each item to be labeled.</li> <li>• If a path is to be drawn there can only be 1 correct path.</li> </ul> <p>Performance checklists used to score performance.</p> <p>The minimum criteria required to be considered proficient such as.</p> <ul style="list-style-type: none"> <li>• Adherence to procedures.</li> <li>• Time.</li> <li>• Accuracy.</li> <li>• Completeness.</li> </ul> <p>How people are qualified to be jurors. How jurors' work is reviewed to assure consistency.</p> <p>What process if followed when a juror decides the performance criteria were not met, i.e.,</p> <ul style="list-style-type: none"> <li>• Is there a second blind review.</li> <li>• Does it require confirmation by another juror.</li> </ul> <p>Who has sign-off authority for assuring the performance checklists match the results of the job analysis and the performance statements.</p>		



***Certification Checklist***  
***Juried Items***

Desired Elements Exist	Yes	No
<p>Juried items are any questions asked of the candidate or statements used to judge work produced by the candidate. Examples of juried items include written responses, oral responses, or portfolio checklists. When the certification includes items requiring completion, short answer, essay, oral responses, or checklists, those questions/statements should be well designed and linked to the job analysis. The documentation should include:</p>	NA	
<p>The standards used for juried items, e.g.,</p> <ul style="list-style-type: none"> <li>• Items are clearly stated so it is not a reading test.</li> <li>• The main ideas precede the blank to be filled in.</li> <li>• The questions or request directed to the candidate should be clear.</li> <li>• Constructed so there is only 1 correct, brief answer.</li> </ul> <p>The checklists used to score the response.</p> <p>The minimum criteria required to be considered proficient such as.</p> <ul style="list-style-type: none"> <li>• Adherence to procedures.</li> <li>• Time.</li> <li>• Accuracy.</li> <li>• Completeness.</li> </ul> <p>How people are qualified to be jurors.</p> <p>How jurors' work is reviewed to assure consistency.</p> <p>What process is followed when a juror decides the performance criteria were not met, i.e.,</p> <ul style="list-style-type: none"> <li>• Is there a second blind review.</li> <li>• Does it require confirmation by another juror.</li> </ul> <p>Who has sign-off authority for assuring the checklists match the results of the job analysis and the performance statements.</p>		

**Certification Checklist**  
**Support Systems**

Desired Elements Exist	Yes	No
When certifications are based on training, tests, or experience, support systems such as study guides, training, on-the-job experience, coaching, etc., may be required. The documentation should include:	Y	
What support systems are available, e.g., <ul style="list-style-type: none"> <li>• Study guides.</li> <li>• Experience inventory.</li> <li>• Observation checklists.</li> <li>• Performance statements.</li> </ul>	Y*	
How the support systems are intended to be used, i.e., <ul style="list-style-type: none"> <li>• Readiness determination.</li> <li>• Post-certification.</li> <li>• On-the-job training.</li> <li>• Remediation.</li> </ul>	Y	
Who has sign-off authority and accountability for confirming the support materials match the results of the job analysis, the performance statements, and any other requirements of the certifications.	Y	

\*Materials are developed and made available through the Association which is a separate body from the Foundation. .

## Certification Checklist Training

Desired Elements Exist	Yes	No
<p>If completion of training or a curriculum is (1) a prerequisite to applying for certification, (2) a condition for certification, (3) recommended prior to taking a test that is required for certification, or (4) prescribed in the event of not successfully passing a test, the training objectives, content, and practice exercises (including tests) must match the results of the job analysis, the performance statements, and the test elements. Documentation includes:</p>	NA	
<p>The procedures used to confirm:</p> <ul style="list-style-type: none"> <li>• The objectives match the performance statements.</li> <li>• Those training objectives to be tested are clearly identified.</li> <li>• That the training exercises and tests measure how well the candidate performs.</li> <li>• The objectives are written at the task level.</li> <li>• The measures, exercises, and tests approximate the actual task performance.</li> <li>• Where an end product is available, the criteria is incorporated into the training objective.</li> <li>• There are instructions on how to administer any tests given during the training.</li> <li>• Where constraints prevent candidates demonstrating performance on the job, the training environment reflects the job environment as much as possible.</li> <li>• Test questions match the training objectives.</li> <li>• Exercises and practice are relevant to the objectives.</li> <li>• Reference materials are available.</li> </ul> <p>Who has sign-off authority for assuring:</p> <ul style="list-style-type: none"> <li>• The training objectives match the results of the job/task analysis and performance statements.</li> <li>• The content of the training matches what is covered in the test.</li> <li>• The content of the training matches what is in the performance statements.</li> <li>• The training matches the study questions in the study guide.</li> <li>• The training provides adequate opportunity to practice the skills and assess learning.</li> </ul>		

*Certification Checklist*  
*Personnel Issues*

Desired Elements Exist	Yes	No
There are issues that have implications on the performance appraisal process. Documentation should include:	NA	
<p>The process for sending study guides to candidates, how long in advance prior to any testing, etc.</p> <p>How candidates can assess their own readiness for the test.</p> <p>Test results:</p> <ul style="list-style-type: none"> <li>• What candidates are told if they meet or exceed standards and if they are told what they should work on.</li> <li>• What candidates are told if they significantly exceed standards and if they are told what they should work on.</li> <li>• What candidates are told if they do not meet standards, i.e., if they are told what they should work on, what parts of the study guide to concentrate on, how long they have before they are required retake the test, etc.</li> </ul> <p>What happens if the employee is scheduled for a performance review during the period of time he/she is studying to retake the test.</p> <p>If study time is paid for and if so, under what circumstances.</p> <p>What information is put in the employee's personnel file.</p> <p>To whom and how test results are distributed:</p> <ul style="list-style-type: none"> <li>• By individual.</li> <li>• By offering.</li> <li>• By content area.</li> </ul> <p>Who has sign-off authority and accountability for these and similar personnel related issues.</p>		