

CPT Certification Program
Policy Booklet

Version: April 2026

All policies approved by the General Credentialing Board

www.NHCOcert.com

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National Healthcare Certification Organization (NHCO) ADA Accommodations, Non-Discrimination Policy, and Statement of Impartiality

The National Healthcare Certification Organization (NHCO) shall provide fair and reasonable accommodations pursuant to the Americans with Disabilities Act (ADA) to individuals with documented disabilities that qualify as medical conditions hindering a person's ability to take the examination under standard testing conditions. The NHCO will consider requests for testing accommodations related to exams from candidates with a documented disability that substantially limits the candidate's sensory, manual, speaking, or other functional skills, including a disability that significantly impairs the candidate's ability to read or otherwise complete the examination. These accommodations can include additional time to take the exam or using approved auxiliary aids.

Candidates must complete the National Healthcare Certification Organization's (NHCO) Exam Accommodations Request form in its entirety for consideration. Information about requesting accommodations is available in the candidate handbook and on the NHCO website.

Incomplete applications requesting special Americans with Disabilities Act (ADA) examination accommodations will not be accepted for consideration by the National Healthcare Certification Organization (NHCO). Applicants will be notified via email if their application and/or supporting documentation are insufficient for informed decision-making. They will be referred to the National Healthcare Certification Organization's (NHCO) ADA Accommodation Request form for information on providing complete documentation.

Applicants who do not meet ADA-required standards will be notified via email with a general reason for the decision. Test accommodation decisions and the underlying rationale will only be communicated via email.

Consistent Decision-Making

There is frequently a disconnection between a clinical or medical diagnosis and the existence of an ADA disability warranting accommodations under the law. In other words, having a diagnosis or a labeled condition does not automatically qualify an applicant for protection, including test accommodations, under the ADA. Prior accommodations, in and of themselves, are not a basis for providing current or future accommodations. Conversely, if no prior accommodations have been provided, the qualified professional should include a detailed explanation as to why no accommodations were given in the past and why accommodations for the applicant are needed

now. This is especially important for developmental conditions such as learning/reading disorders and attention deficit hyperactivity disorder (ADHD), as these conditions generally originate in childhood. One would expect substantial difficulties early in life that warrant therapy and/or accommodations. Impartial decision-making using consistent and professional standards protects testing and credentialing organizations from liability and maintains the credibility of the credentials awarded. In the interest of maintaining score integrity, test validity, and fairness for all test takers, and to protect the National Healthcare Certification Organization (NHCO) and its vendors from legal challenges, NHCO reviews all accommodation applications against the ADA standard of disability rather than simply the presence of a diagnostic label.

In their consideration of ADA accommodations requests, the National Healthcare Certification Organization (NHCO) should make a clear distinction between accommodations that are generally provided by educational institutions to assist students in improving their academic performance and the ADA's more specific interpretation of "substantial limitation" in functioning compared to the "average person."

Resolving accommodation disputes in lieu of an appeals process (which is not required by the ADA), the National Healthcare Certification Organization (NHCO) should provide applicants with an opportunity to provide supplementary data or to request reconsideration of a negative decision if there is a substantive basis for doing so. If a negative decision is made based on sufficient data, then the basis of an appeal is the applicant's dissatisfaction with the decision, which is non-substantive and would, therefore, not merit reconsideration. Applicants should give a substantive basis for the appeal, such as supplemental information or identification of errors (e.g., incorrect reporting of test scores or other evaluator errors).

No information on ADA applicants will be provided to a third party, either verbally or in written format, without prior written release from the applicant. ADA applications and documentation will not be made available to, nor stored with, vendors. The National Healthcare Certification Organization (NHCO) reserves the right to negotiate a settlement to a decision-making dispute at its discretion. However, this should be done confidentially and on an individual, as-needed basis.

Non-Discrimination Policy

The National Healthcare Certification Organization (NHCO) accepts all properly completed examination applications from eligible applicants regardless of the applicant's age, sex, race, religion, marital status, disability, sexual orientation, gender identity, or national origin, or any other characteristic protected under applicable state or federal laws.

Statement of Impartiality

The National Healthcare Certification Organization (NHCO) is fully committed to conducting all of its certification activities with the highest degree of impartiality, integrity, and fairness. NHCO recognizes that impartiality is essential to ensure public confidence in its certification programs, its governance processes, and the credibility of its credentials.

To protect this principle, NHCO has established and maintains a robust framework that actively identifies, monitors, and manages any risks to impartiality. This includes:

- Ensuring that all decisions related to certification, policy development, disciplinary actions, and appeals are made free from undue influence or bias.
- Requiring all Board members, committee members, volunteers, and staff to disclose actual, potential, or perceived conflicts of interest and recuse themselves from decisions where impartiality could be compromised. See the Recusal Process contained in Policy 34.0 - Mitigation of Conflict and Recusal Policy.
- Prohibiting commercial, financial, or other pressures that could improperly affect certification decisions or organizational policies.
- Promoting transparency in all policies, procedures, and decision-making processes.
- Maintaining clear boundaries between organizational functions to ensure fairness and impartiality.
- Requiring adherence to a formal Code of Conduct and Conflict of Interest Policy for all individuals involved in NHCO operations.

NHCO regularly reviews and improves its impartiality safeguards as part of its commitment to continuous quality improvement and stakeholder trust. All individuals involved in NHCO's certification processes share responsibility for upholding these standards.

National Healthcare Certification Organization (NHCO) Antitrust Policy

The National Healthcare Certification Organization (NHCO) has a policy of compliance with federal antitrust laws that prohibit certain combinations and agreements among competitors. Members of an organization, such as NHCO, may be considered competitors in antitrust matters, regardless of the geographic location of their businesses, products, or service lines.

Antitrust violation penalties can be very serious for the National Healthcare Certification Organization (NHCO) and NHCO’s staff, Board and Committee members, and certificants.

The National Healthcare Certification Organization (NHCO) staff, Board and Committee members, and certificants cannot come to understandings, make agreements, or otherwise concur on positions or activities that in any way tend to raise, lower, or stabilize prices or fees, divide up markets, or encourage boycotts. Each must make an independent decision, without consultation with competitors, on how to conduct business and with whom to do business. Specifically, certificants should never agree on:

- Current or future prices or fees, price or fee changes, discounting, regulation of production, and other terms and conditions of sale or of providing services.
 - Certificants should be extremely careful about discussing prices or fees. Agreements on pricing and fees are illegal. Even price or fee discussions by competitors, if followed by parallel action among the competitors on pricing or fees, can lead to antitrust investigations or challenges.
- Allocating or monopolizing territories or customers.
 - Any agreement by competitors to “honor,” “protect,” or “avoid invading” one another’s market areas or product lines could violate the law.
- Refusing to do business with those whose business practices certificants oppose.
 - Certificants can discuss the policies or practices of suppliers and other third parties. However, certificants must never threaten, directly or indirectly, to collaborate to enforce changes to those policies or practices. Again, discussions followed by parallel action could trigger antitrust scrutiny.

NHCO staff, Board and Committee members, and certificants should never make any statement, publicly or privately, that would appear to represent an official policy or position of the National Healthcare Certification Organization (NHCO) without the express written authorization of NHCO executives. The U.S. Supreme Court has determined that recommendations or exhortations in antitrust areas by individuals who might appear to represent an association in some capacity can jeopardize the association; those in positions of responsibility for the National Healthcare Certification Organization (NHCO) must be especially cautious.

Antitrust laws are complicated. If any certificant is concerned that he or she may be in a “gray area,” that certificant should consult with the National Healthcare Certification Organization’s staff or legal counsel. If the conversation among competitors at an NHCO meeting turns to antitrust-sensitive issues, participants should discontinue the conversation until legal advice is obtained or leave the meeting immediately. Court cases have demonstrated that individuals present when an antitrust violation occurred, even when they did not actively participate in the conversation, were held personally accountable and liable for the antitrust violation.

National Healthcare Certification Organization (NHCO) Appeals Policy

Purpose

This policy ensures fair, transparent, and legally sound procedures for individuals seeking to appeal decisions related to certification eligibility, certification status, or renewal of certification with the National Healthcare Certification Organization (NHCO). This policy does not cover appeals regarding exam scores or exam security violations, which are addressed under Policies 7.0 – Complaint Policy and 28.0 – Examination Security Policy, respectively.

Scope

This Appeals Policy applies to:

- Denial of initial certification or renewal
- Suspension or revocation of certification (not related to disciplinary or misconduct issues)
- Eligibility decisions prior to examination

This policy does not apply to:

- Examination results or scoring decisions (see Policy 7.0 – Complaint Policy)
- Examination misconduct, proctoring issues, or technical incidents (see Policy 28.0 – Examination Security Policy)
- Disciplinary actions taken under the NHCO’s Policy 11.0 – Disciplinary Policy

Submission of Appeals

1. How to Appeal

Appeals must be submitted using the official directions and appeal form provided on the candidate's online NHCO portal account at <https://portal.nhcocert.com/>. Appeals must include:

- All relevant documentation (e.g., denial letters, proof of graduation, letters of recommendation, etc.)
- A copy of the correspondence received from the NHCO (e.g., examination denial, eligibility determination)

2. **Deadline**

Appeals must be received within thirty (30) calendar days from the date of the NHCO decision being appealed. Late appeals will not be considered.

Review Process

1. Appeals will be reviewed by the VP of Certification.
2. The VP of Certification will:
 - Acknowledge receipt of the appeal
 - Request additional information if necessary
 - Review all submitted materials within thirty (30) calendar days
3. All final decisions will be communicated to the candidate via email and documented in the NHCO records.
4. All decisions issued under this policy are final and not subject to further appeal.

Examination Scores and Misconduct

- **Pass/Fail Scores Are Final:** The NHCO examination scores are final and not subject to appeal under this policy. They are based on psychometrically validated scoring methods and reviewed only in the context of examination security (see Policy 28.0 – Examination Security Policy).
- **Security or Technical Issues:** Any allegations of testing misconduct or technical disruptions must be reported through the procedures outlined in Policy 28.0 – Examination Security Policy and may result in the voiding of results or further investigation.

Confidentiality and Records

- All appeal-related communications will be maintained in a confidential and secure manner.
- The NHCO will only release appeal information if required by law or upon written permission of the appellant.
- The NHCO staff will retain a record of all appeals, decisions, and correspondence for a minimum of 7 years.

Non-Retaliation Clause

- The NHCO strictly prohibits retaliation against any individual who files an appeal in good faith. Retaliation may be subject to disciplinary action in accordance with the NHCO's Policy 11.0 – Disciplinary Policy.

National Healthcare Certification Organization (NHCO) Attendance Policy

It is the policy of the National Healthcare Certification Organization (NHCO) General Credentialing Board that Board or Committee Members attend all meetings and conference calls as defined by the National Healthcare Certification Organization (NHCO) Bylaws. Any Member unable to attend a designated meeting must notify the Executive Director as soon as possible before the stated time of the designated meeting. Lack of attendance by a General Credentialing Board or Exam Review Committee Member may be defined as an attendance problem if the following conditions exist:

- The Board or Committee Member fails to attend three (3) consecutive meetings or one-half (1/2) of the meetings of the Board or Committee in any consecutive twelve-(12) month period.
- The Board or Committee Member has two un-notified absences within their term limit.
 - An un-notified absence shall be defined as a Member's failure to notify the Executive Director of the pending absence before the designated meeting as defined by this policy.
- The Board Member has more than one notified absence in a calendar year and three (3) notified absences within their term limit.
- The Committee Member has more than one notified absence in a calendar year and two (2) notified absences within their term limit.
- The Board or Committee Member has more than one notified absence on a conference call or adhering to a web review deadline within a calendar year.

An occurrence of any of the above conditions may lead to censure of the Board or Committee Member in question, up to and including removal from their position within the National Healthcare Certification Organization (NHCO).

Upon establishing one of the above conditions, the National Healthcare Certification Organization (NHCO) Executive Director will contact the Board or Committee Member to initiate a dialogue related to the concern. It is the Executive Director's responsibility to present the concern and subsequent discussion to the Board or Committee at their next scheduled

meeting. The Member in question may exercise the right to present their case at the time of the Board or Committee's review and must be notified before the Board or Committee intends to review the concern.

The Board or Committee will ultimately determine an appropriate course of action. The Executive Director will notify the Member of the action taken by the Board or Committee.

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**National Healthcare Certification Organization (NHCO)
Budget Development and Allocation of Costs Policy**

The National Healthcare Certification Organization (NHCO) Executive Director, working in collaboration with the National Healthcare Certification Organization (NHCO) Controller, shall be responsible for developing the organization's annual budget. The Executive Director and Controller shall meet before the last scheduled General Credentialing Board meeting of the year to finalize the annual budget. The budget shall be presented and subject to the approval of the General Credentialing Board at the last scheduled meeting of the year.

The Controller allocates costs to various programs based on year-to-date trends provided in a spreadsheet to best determine incoming revenues for the upcoming year. Staff provides expenses utilizing the same projecting method.

Mid-year adjustments can be made with collaboration between the Executive Director and the Controller, with final adjustment approval from the National Healthcare Certification Organization (NHCO) General Credentialing Board.

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National Healthcare Certification Organization (NHCOC) Candidate Name Change Policy

Candidates holding credentials through the National Healthcare Certification Organization (NHCOC) may request a name change for issued certification documents. To do so, candidates must submit the Name Change form and all applicable fees.

Individuals must also provide a copy of one (1) of the following documents listed below to verify a name change:

- Marriage Certificate
- Divorce Decree
- Current Driver's License
- Social Security Card
- Naturalization Paperwork
- Passport
- Official court document displaying name change

Candidates requesting a name change must apply online at [NHCOcert.com](https://www.nhco-cert.com).

National Healthcare Certification Organization (NHCO) Complaint Policy

Purpose

This policy provides a structured, transparent, and fair process for addressing complaints submitted to the National Healthcare Certification Organization (NHCO) that do not fall under the scope of the NHCO Disciplinary Policy, Examination Security Policy, or Appeals Policy.

Scope

This policy applies only to complaints that directly relate to the NHCO's policies, procedures, communications, or published materials. Examples may include (but are not limited to):

- Authorization to test timelines
- Retest eligibility timelines
- Content inconsistencies in the candidate handbook or other official publications
- Procedural inconsistencies in the NHCO's operations or communications

This policy does not cover the following:

- Examination scoring or pass/fail results (see Policy 28.0 – Examination Security Policy)
- Disciplinary or misconduct issues (see Policy 11.0 – Disciplinary Policy)
- Certification eligibility decisions, certification denial, suspension, or revocation (see Policy 3.0 – Appeals Policy)

Submission Requirements

To be considered, a complaint must:

- Be submitted within thirty calendar days of the incident or issue giving rise to the complaint
- Be submitted in writing through the procedure outlined on the NHCO website
- Be addressed to the Executive Director
- Be signed by the complainant(s). Anonymous or unsigned complaints will not be accepted

The NHCO will provide written acknowledgment of receipt of the complaint within five business days.

Review and Resolution Process

- A designated NHCO staff member will investigate the complaint within thirty calendar days of receipt.
- The investigation may include consultation with relevant staff, review of documentation, and interviews, if applicable.
- A written response outlining the findings and any corrective actions (if necessary) will be emailed to the complainant.
- The decision shall be final and not subject to further appeal under NHCO policy.

Confidentiality

The NHCO will maintain confidentiality regarding the identity of the complainant(s), unless:

- Written permission is granted to disclose identity, or
- Disclosure is required by law, court order, or regulatory authority

All complaint-related information will be stored securely.

Documentation and Recordkeeping

- The NHCO will retain a record of all complaints, resolutions, and related communications for a minimum of seven years, consistent with the retention period defined in the NHCO Appeals Policy.

Non-Retaliation

- The NHCO strictly prohibits retaliation against any individual who submits a complaint in good faith. Any retaliatory conduct will be addressed under Policy 11.0, the NHCO's Disciplinary Policy and may result in sanctions or removal from current or future participation in NHCO activities.

National Healthcare Certification Organization (NHCO) Conflict of Interest and Confidentiality Policy

In conducting the business of the National Healthcare Certification Organization (NHCO), all personnel must ensure that decisions are based solely on the application of sound judgment and the highest standards of professional conduct. This policy aims to provide general direction so that personnel can seek further clarification on issues related to acceptable standards of conduct.

For the purposes of this policy, "personnel" includes: board members, committee members, subject matter experts, employees, volunteers, independent contractors, vendor personnel, and any individuals employed by NHCO vendors who have access to examination content, candidate information, or organizational decision-making processes.

Volunteers are defined as any person duly appointed to serve on the General Credentialing Board or any standing or ad hoc committee of the National Healthcare Certification Organization (NHCO).

DEFINITION OF CONFLICT OF INTEREST

A conflict of interest may be defined as:

A circumstance in which an individual's capacity to make an impartial or unbiased decision may be affected because of prior, current, or future affiliation(s), other significant relationship(s), or association(s).

An actual or potential conflict of interest occurs when personnel are in a position to influence a decision that may result in personal, professional, or financial gain for themselves, a relative, or a close personal or business associate due to the conduct of the National Healthcare Certification Organization (NHCO) business. For the purpose of this policy, a relative is any person who is related by blood or marriage or whose relationship with the individual is similar to that of persons who are related by blood or marriage.

No "Presumption of Guilt" is created by the mere existence of a relationship with outside firms. However, if personnel have any influence on business transactions of the National Healthcare Certification Organization (NHCO), they must disclose the existence of the potential conflict of interest to the NHCO so that safeguards can be established to protect all parties.

EXAMPLES OF CONFLICTS OF INTEREST

Examples of the types of activities that might cause a conflict of interest include, but are not limited to, the following:

- Acceptance of money or gifts exceeding \$50.00 in value received in exchange for services and/or business transactions, above and beyond any compensation for their own duties, provided to the National Healthcare Certification Organization (NHCO).
 - Having a financial interest in an outside concern from which the National Healthcare Certification Organization (NHCO) purchases goods or services.
 - Accepting personal compensation for NHCO-related speaking engagements, consultative services, or other activities.
 - Representing the National Healthcare Certification Organization (NHCO) in any transaction in which the individual (or immediate family) has a substantial interest.
 - Proctoring an examination for an individual with whom they have a personal, familial, or professional relationship that could compromise impartiality.

CONFLICT OF INTEREST PROCEDURES

If any Director of the General Credentialing Board or any member of any Exam Review Committee has a conflict of interest in any matter brought before the body for a vote, that person shall declare such conflict before the matter is considered. Further, any other Director or member of an Exam Review Committee may share their concern(s) regarding someone else's potential conflict of interest before any matter is considered.

If the conflict of interest is undisputed, then the Director or member of an Exam Review Committee, as appropriate, shall not participate in any discussion or consideration of the matter, shall not participate in any vote on the matter, and shall not even be present for any discussion, consideration, or vote on the matter.

When a conflict of interest is alleged, but is disputed or otherwise questioned, before considering the matter, the General Credentialing Board or Exam Review Committee, as appropriate, shall consider all relevant information, and the disinterested Directors or members of the Exam Review Committee, as appropriate, shall make a determination on the existence of such conflict of interest. The deliberation and determination on the potential existence of a conflict of interest may occur at the meeting in which the matter giving rise to the potential conflict of interest is otherwise going to be considered by the General Credentialing Board or Exam Review Committee, as appropriate, or a special meeting may be held to specifically address the potential conflict of interest, but in either event, such deliberation and determination regarding the potential conflict of interest shall occur prior to the General Credentialing Board or Exam Review Committee, as appropriate, addresses the actual matter giving rise to the potential conflict of interest. If a conflict of interest is established, then the Director or member of an Exam Review Committee, as appropriate, shall not participate in any discussion or consideration

of the matter, shall not participate in any vote on the matter, and shall not even be present for any discussion, consideration, or vote on the matter.

If a conflict of interest extends beyond a single isolated matter to be considered by the General Credentialing Board or Exam Review Committee, as appropriate, then the Director or member of an Exam Review Committee shall be immediately disqualified and removed from further service as a Director or member of an Exam Review Committee.

On an annual basis, each individual covered by this policy will sign a statement acknowledging they have read and understand these policies. Signed statements will be maintained by the National Healthcare Certification Organization (NHCO).

For all other personnel, including employees, contractors, and vendor personnel, conflicts of interest shall be disclosed immediately to the Executive Director in writing. The Executive Director will review the disclosure, implement appropriate mitigation measures, and escalate to the General Credentialing Board if the conflict is material or ongoing.

CONSULTATION SERVICES AND EXAMINATION PREPARATION

Personnel of the National Healthcare Certification Organization (NHCO) will not serve in any consultative capacity related to the development of examinations or examination-supportive materials related to the organization's business. Personnel engaged in consultative activities shall divest themselves of those activities prior to the commencement of their term of appointment/employment.

Furthermore, personnel agree to not engage in any of the following activities during their service to NHCO and for a period of two (2) years following the termination of their service:

- Consulting on examination development or item writing for the NHCO CPT examination or similar phlebotomy certification examinations
- Authoring, editing, or contributing to examination-related materials including study guides, test banks, or reference materials
- Conducting, contributing to, or participating in examination preparation workshops, seminars, courses, webinars, or training programs
- Developing or selling examination preparation materials or courses
- Providing individual tutoring or coaching specifically focused on NHCO CPT examination preparation

EXAMINATION ELIGIBILITY RESTRICTIONS

Personnel with access to confidential examination items, materials, or organizational decision-making processes regarding the NHCO Certified Phlebotomy Technician (CPT) examination are restricted from sitting for the examination to ensure the integrity of the

certification process.

Specifically, personnel acknowledge and agree that they will not be able to take the NHCO Certified Phlebotomy Technician (CPT) examination while serving in their role with NHCO and for two (2) years following the end of their service, in order to become certified, renew certification, or achieve certification currency.

This restriction applies to all personnel including board members, committee members, subject matter experts, employees, volunteers, contractors, vendors, and vendor personnel with access to examination content or processes.

Personnel who hold current NHCO CPT certification at the time of their appointment may maintain that certification through the standard renewal process, provided they do not have access to confidential examination items during the renewal period. However, they may not sit for the examination (initial certification or recertification by examination) during their service period and for two (2) years following.

All personnel are required to sign the Conflict of Interest and Confidentiality Agreement (see COI Agreement v2.0), which includes acknowledgment of these examination eligibility restrictions.

CONFIDENTIALITY

Personnel of the National Healthcare Certification Organization (NHCO) shall not discuss organizational matters or disclose or use any information specific to the business of the National Healthcare Certification Organization (NHCO), except when participating in sanctioned business. Unauthorized disclosure or use of verbal or written information is considered a serious breach of confidentiality and can result in disciplinary action and possible discharge from their position.

Upon establishing a breach of confidentiality, the Executive Director will contact the individual to initiate a dialogue related to the concern. The Executive Director will present the concern and subsequent discussion to the General Credentialing Board at their next scheduled meeting. The individual in question may exercise the right to present their case at the time of the Board's review and must be notified beforehand of the Board's intent to review the concern.

The General Credentialing Board will be responsible for the ultimate determination and for an appropriate course of action, which may include, but is not limited to, disciplinary measures, removal from duties, or termination of service, as applicable. Any disciplinary action related to a member of the General Credentialing Board must be approved by a majority vote of the Board. The Executive Director will be responsible for notifying any member of the Board's action.

The National Healthcare Certification Organization (NHCO) requires that its procedures be

sensitive to maintaining document confidentiality in the certification process while also disclosing certain information to serve and protect the public interest.

This requirement shall be waived for any documents the National Healthcare Certification Organization (NHCO) must disclose relative to a bona fide judicial or governmental process.

National Healthcare Certification Organization (NHCO) CPT Examination Eligibility Requirements Policy

Purpose

This policy outlines the minimum eligibility criteria and documentation requirements for candidates seeking to take the Certified Phlebotomy Technician (CPT) examination administered by the National Healthcare Certification Organization (NHCO). The purpose of this policy is to ensure a fair, standardized, and legally sound process aligned with industry best practices and applicable regulatory requirements.

I. General Eligibility Criteria

To be eligible for the NHCO CPT examination, an applicant must meet **all** of the following general requirements:

1. Minimum Education

- Be a high school graduate or hold a state-recognized equivalent (e.g., GED, HiSET).
- Documentation: Official high school transcript, diploma, or equivalent credential.

2. Minimum Age

- Candidates must be at least 18 years of age at the time of application.

3. Application Submission

- All candidates must submit a complete application through the official NHCO portal: www.NHCOcert.com.

4. Eligibility Attestation

- All applicants must sign the Eligibility Attestation Statement certifying that all submitted information is accurate and truthful under penalty of disqualification or revocation.

II. Eligibility Routes

To be eligible to sit for the National Healthcare Certification Organization (NHCO) Certified Phlebotomy Technician (CPT) exam, a candidate must qualify under **one** of the following two eligibility routes:

Route 1 – Training and Education (Completed Within the Last 4 Years)

1. Completion of a phlebotomy training program through:
 - A state-approved or nationally accredited institution; **OR**
 - A branch of the United States Military.

2. Required Documentation:
 - Certificate of completion or official transcript.
 - The program must include a practical component with documentation of:
 - Minimum 30 successful venipunctures **AND**
 - Minimum 10 successful capillary collections on live individuals.

3. Training programs must have been completed within four years of the date of examination application submission.

Route 2 – Employment Experience

1. Applicants who have not completed a formal training program may qualify based on verifiable work experience in the field of phlebotomy:

Option A – One Year

- Employed as a full-time Phlebotomy Technician for at least one continuous year within the past two years.

Option B – Two Years

- Employed as a full-time Phlebotomy Technician for at least two cumulative years within the past four years.

2. Required Documentation:

Employer Verification: (one of the following)

- A completed employer verification form signed by a supervisor; OR
- An official letter from the HR department confirming employment and total hours worked within the required timeframe

Proof of Hours Worked:

- Pay stubs that clearly show accumulated hours for each applicable period of employment

Clinical Experience Documentation — evidence of at least:

- 30 successful venipunctures, AND
- 10 successful capillary collections performed on live individuals

III. Timelines and Expiration of Eligibility

- **Eligibility Window:** Eligible candidates will have 90 days from the application purchase date to schedule and complete their first attempt at the CPT exam.
- **Reapplication Requirement:** If the candidate does not take or pass the exam within this 90-day window, a new application must be submitted with updated documentation.
- **Document Validity:**
 - **Route 1 (Training and Education):** Training must have been completed within four (4) years of the application submission date
 - **Route 2, Option A:** Employment must have occurred within the past 2 years of the application submission date
 - **Route 2, Option B:** Employment must have occurred within the past 4 years of the application submission date
 - Expired or undated documents will not be accepted.

IV. Fraudulent or Misleading Applications

- Submission of falsified documents or misrepresentation of eligibility may result in immediate disqualification, revocation of credentials, and referral to appropriate authorities for investigation.
- NHCO reserves the right to audit any submitted documentation and to contact employers or training institutions for verification.

V. Reasonable Accommodations

- NHCO complies with the Americans with Disabilities Act (ADA) and will provide reasonable testing accommodations upon documented request. See Policy 1.0 – ADA Accommodations, Non-Discrimination Policy, and Statement of Impartiality Policy for more information.
- Candidates must complete the accommodation request form and wait for an approval notification before taking the certification exam.

VI. Appeals Process

- Applicants who are deemed ineligible may submit an appeal to the NHCO Executive Director within 30 calendar days of receiving the denial notice via the candidate's online portal at <https://portal.nhcocert.com/>.

- Appeals will be reviewed, and a written decision will be provided within 45 calendar days.

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National Healthcare Certification Organization (NHCO) Denial and Revocation of Certification

The National Healthcare Certification Organization (NHCO) may consider revocation or denial of certification. Examples of the activities that may cause revocation or denial of certification include, but are not limited to, the following:

1. Possession of, use of, and/or attempt to use altered or falsified certification cards or certificates.
2. Obtaining or attempting to obtain certification or renewal by fraud or deception.
3. Knowingly assisting another to obtain or attempt to obtain certification or renewal by fraud or deception.
4. Unauthorized possession, use, copying, reproduction, and/or distribution of any official National Healthcare Certification Organization (NHCO) examination materials, including any part of the examination questions or problems.
5. Violation of examination rules, including but not limited to, cheating on the examination.

The National Healthcare Certification Organization (NHCO) retains the sole authority to amend or repeal its policies regarding denial or revocation of certification at any time, including but not limited to, the authority to add new grounds for denial or revocation and add provisions for suspension of certification.

National Healthcare Certification Organization (NHCOC) Disciplinary Policy

A. General

The General Credentialing Board has approved the following as reasons for which disciplinary action(s) may be taken against the National Healthcare Certification Organization (NHCOC) examination candidates, credentialed individuals, and non-credentialed individuals:

1. Obtaining or attempting to obtain certification or renewal by fraud, deception, or artifice.
2. Knowingly assisting another person or persons in obtaining or attempting to obtain certification or renewal by fraud, deception, or artifice.
3. Unauthorized use of a certification certificate, or falsification of any credentials or any other National Healthcare Certification Organization (NHCOC) documents.
4. Unauthorized possession, use, copying, reproduction, and/or distribution of any official National Healthcare Certification Organization (NHCOC) examination materials, including any part of the examination questions or problems.
5. The following dispositions of offenses directly related to the practice of phlebotomy that give cause to question the individual's ability to practice in a safe and competent manner:
 - a) Conviction in a court of law, after all appeals have been exhausted, of:
 - 1) a drug or alcohol-related offense concerning the individual's practice.
 - 2) a job-related offense indicating the individual's intentional negligence and/or purposeful misconduct that endangers a patient's health and/or safety.

- 3) an act of physical violence (murder, assault, rape, robbery, etc.) that would cause questions as to the individual's ability to interact with patients and others on the job appropriately.
- b) Revocation or denial of a license or certificate to practice phlebotomy, or another health-related profession, by an authorized state agency due to:
- 1) a drug or alcohol-related offense concerning the individual's practice.
 - 2) a job-related offense indicating the individual's intentional negligence and/or purposeful misconduct that endangers a patient's health and/or safety.
 - 3) an act of physical violence (murder, assault, rape, robbery, etc.) that would cause questions as to the individual's ability to interact with patients and others on the job appropriately.
- c) Voluntary surrender of a license or certificate to practice phlebotomy, or another health-related profession, by a credentialed individual and/or examination candidate to an authorized state agency after the filing of a complaint proceeding by an authorized state agency alleging:
- 1) a drug or alcohol-related offense concerning the individual's practice.
 - 2) a job-related offense indicating the individual's intentional negligence and/or purposeful misconduct that endangers a patient's health and/or safety.
 - 3) an act of physical violence (murder, assault, rape, robbery, etc.) that would cause questions as to the individual's ability to interact with patients and others on the job appropriately.

B. Purpose

To enforce and apply these policies when required, the National Healthcare Certification Organization (NHCO)'s General Credentialing Board will organize a Specialty Committee convened for the purpose of reviewing the Disciplinary concern. The Committee is comprised of a minimum of one (1) member of the General Credentialing Board, who will:

1. Receive reports or complaints of alleged violations or dispositions involving matters described in items 1-5 listed in Part A above, after review by the National Healthcare Certification Organization (NHCO) staff as described in item 1a) of Part C of this policy.
2. With respect to matters described in items 1-4 of Part A, determine whether or not the report or complaint warrants consideration or is appropriate for action by the National Healthcare Certification Organization (NHCO) and, if so:
 - a) Establish a course of action to address reports and complaints received by the Committee.
 - b) Notify the candidate or credentialed individual of the course of action and provide an opportunity for a hearing and appeal in accordance with the procedures outlined in Part C below.
3. With respect to matters described in item 5 of Part A, apply the procedures outlined in Part D below.
4. Notify the General Credentialing Board of all actions.

C. Notification, Hearing, and Appeal: Matters Described in Items 1-4 of Part A

The National Healthcare Certification Organization (NHCO) will follow these procedures with respect to matters described in items 1-4 of Part A above:

1. Notification of Complaint
 - a) Upon receiving a report or complaint of alleged violations of Items 1-4 of Part A of this document, the National Healthcare Certification Organization (NHCO) staff (through the Executive Director or designee) shall have the authority to review the matter and determine whether there is any appropriate action to be taken before forwarding to the Committee.
 - b) Subsequent to review and subject to any action determined appropriate by the National Healthcare Certification Organization (NHCO) staff, the Executive Director or designee shall forward the report of complaint to the Committee (by secure electronic or hard copy media).

- c) At the next regularly scheduled meeting or by telephone conference call, the Committee shall determine whether or not there appears to be a reasonable basis to believe that the offense reported or charged has been committed.
 - 1. If there is reasonable doubt about the validity of the report or charge, or if the matter is determined inappropriate for the Committee's attention, the Executive Director or designee shall be instructed to respond appropriately to the individual(s) who presented the charge.
 - 2. If reasonable belief is that the report or charge warrants consideration, the Committee shall instruct the Executive Director or designee to notify the charged party of the charge in writing and provide them with the opportunity for a written response within 30 calendar days from the date the letter is received.
 - 3. All correspondence between the National Healthcare Certification Organization (NHCO) and the charged party will be sent via certified mail, restricted delivery, with a return receipt requested.

2. Hearing

- a) At the end of the 30-day period, the Committee shall schedule a hearing on the complaint by telephone conference call. It shall provide written notification by certified mail to all parties. The National Healthcare Certification Organization (NHCO) will bear the telephone expense of the conference call. Notwithstanding the foregoing, if the charged party desires an in-person hearing, they must notify the Committee in their written response. In such a case, the complaint will be heard by the Committee at its next regular meeting, or a sooner time as determined by the Committee, to be held at a location determined by the Committee. The charged party will bear their own expenses for travel to and from and accommodations while at the location of an in-person hearing.
- b) If the charged party does not respond to the complaint or requests that a hearing not be conducted, the Committee shall consider the alleged violation(s) and all information available to the Committee to determine what disciplinary action, if any, is to be taken, and shall send a written

copy of its decision to the charged party, the complaining party, and the General Credentialing Board.

3. Hearing Procedure

- a) The testimonies of witnesses and any other available evidence, including written submissions, regarding the alleged violation(s) shall be received by the Committee. Testimonies shall be taken under oath. All written materials must be submitted under oath, if not submitted in person.
- b) The parties shall have the opportunity to cross-examine witnesses and shall have access to any other evidence received by the Committee.
- c) The hearing shall be informal, and conformity to legal rules of evidence will not be necessary.
- d) The Committee may exclude any individuals from the hearing conference call (or the hearing room, in the case of an in-person hearing) at any time at its discretion, except that the parties and their representatives, if any, shall be entitled to be present at all times.
- e) A record of the hearing shall be made at the expense of the National Healthcare Certification Organization (NHCO). At the discretion of the Committee, the record may be in the form of a transcript or by recording.
- f) The Committee shall base its decision solely on the hearing record and shall provide findings of fact to support its conclusions on the offense(s) charged.
- g) A copy of the decision shall be sent by registered mail (signature(s) required) to the charged and complaining parties.

4. Appeal

- a) The charged party shall have 30 calendar days following the date of the Committee's decision to file a note of appeal, by written correspondence, through the Executive Director or designee, to the General Credentialing Board.

- b) The General Credentialing Board, excluding the members who participated in the Committee decision in the case, shall review the record of the hearing at its next regularly scheduled meeting and shall issue its decision, affirming, modifying, or vacating the decision of the Committee. The matter will not be retried before the General Credentialing Board. The decision of the Board will be based upon the hearing record.
- c) A majority vote of the General Credentialing Board present (excluding the members of the Committee who participated in the Committee decision in the case) shall be required to reach a decision on any appeal. In all cases, the decision of the General Credentialing Board shall be deemed final. If the General Credentialing Board is evenly divided on a matter, the decision of the Committee shall be considered affirmed.

5. Right to Counsel

The parties shall be entitled to representation by counsel of their choice during all stages of the proceedings at their own expense.

6. Expenses

Except as otherwise stated above, the parties will bear their own expenses associated with the proceedings.

D. Automatic Discipline: Matters Described in Item 5 of Part A

In the event of the occurrence of an offense described in Item 5 of Part A above, the Committee shall proceed directly to impose discipline in accordance with Item 2 of Part E below, provided, however, that this may be done only if, before taking any such action, the National Healthcare Certification Organization (NHCO) has received documentary evidence of the action taken by the court or state licensing agency with respect to such individual (or of the voluntary surrender of a license or certificate by such individual), and counsel for the National Healthcare Certification Organization (NHCO) has advised the National Healthcare Certification Organization (NHCO) that the action so documented falls within the offenses described in Item 5 of Part A.

E. Disciplinary Action

1. After conducting a hearing as outlined in Part C of these policies, the Committee may take one of the following types of disciplinary action against the charged party if, in its judgment, action is warranted by the offense committed:

a) For examination candidates and other non-credentialed individuals:

- 1) Admonishment - A letter signed by the Executive Director of the National Healthcare Certification Organization (NHCO) will be sent to the individual indicating that NHCO is concerned by the violation committed and that, should an additional incident occur, more stringent action is possible. A copy of this letter will remain in the individual's file for two years and shall be removed and destroyed at the end of that time, provided no additional incidents are reported.
- 2) Formal Censure - The individual shall be sent a letter signed by the Executive Director of the National Healthcare Certification Organization (NHCO) expressing a formal censure. Notice of this action shall remain in the individual's file unless revoked by a majority vote at a future meeting of the General Credentialing Board.
- 3) Removal from the Examination Process/Processes for a Specified Period - This disciplinary action shall prohibit the acceptance of an application for any examination, including the self-assessment program, for a specified length of time. At the end of the specified period, the individual would again be eligible to apply to the examination programs under the current admission requirements, provided no additional sanctions have been imposed for other violations of the National Healthcare Certification Organization's (NHCO) policies.

This action may be applied to all individuals eligible for any examination offered by the National Healthcare Certification Organization (NHCO). This action may apply to any stage of the examination process, including the withholding of the formal certificate of recognition of an examination already completed.

- 4) Removal from the Examination Process for an Indefinite Period of Time - The same provisions outlined in Item c) above may be

invoked by the National Healthcare Certification Organization (NHCO), with the difference being that the individual shall be barred from all examination programs indefinitely. To be reinstated, the individual must petition (in writing) the National Healthcare Certification Organization (NHCO) for reinstatement and provide cause as to why reinstatement should occur.

b) For credentialed individuals:

- 1) Admonishment - A letter signed by the Executive Director of the National Healthcare Certification Organization (NHCO) will be sent to the individual indicating that the National Healthcare Certification Organization (NHCO) is concerned by the violation committed and that, should an additional incident occur, more stringent action is possible. A copy of this letter will remain in the individual's file for two years and shall be removed and destroyed at the end of that time, provided no additional incidents are reported.
- 2) Formal Censure - The individual shall be sent a letter signed by the Executive Director of the National Healthcare Certification Organization (NHCO) expressing a formal censure. Notice of this action shall remain in the individual's file unless revoked by a majority vote at a future meeting of the General Credentialing Board.
- 3) Deletion of Current Certification for a Specified Period of Time - A certificant may be disqualified from eligibility for "active" status for a specified length of time. This will result in the individual's name being listed as "Temporarily Suspended" in their record. During the period of suspended classification, the individual shall not use any official designation for any purpose whatsoever. At the end of the period, the individual will again qualify for active status provided all requirements of the General Credentialing Board are satisfied and no additional violations of the National Healthcare Certification Organization's (NHCO) policies occur.
- 4) Deletion from Current Certification for an Indefinite Period of Time - The name of a certificant shall be deleted indefinitely from the record. During the period of deletion from the record, the

individual shall not use any official designation for any purpose whatsoever. All inquiries concerning the individual's status shall be answered to the effect that the individual is recognized as a credentialed person and has successfully completed the appropriate examinations, but that he or she is not listed in the record due to disciplinary action taken for violation of the National Healthcare Certification Organization's (NHCO) policies. To be reinstated, the individual must petition (in writing) the National Healthcare Certification Organization (NHCO) for reinstatement and provide cause as to why reinstatement should occur.

5) Disqualification from Recredentialing or Self-Assessment Programs - A certificant may be disqualified from participating in any re-credentialing or self-assessment program administered by the National Healthcare Certification Organization (NHCO). Such disqualification may be for a specified period of time or for an indefinite period as determined by the committee. During the period of deletion from the record, the individual shall not use any official designation for any purpose whatsoever.

c) For credentialed individuals who may also be examination candidates or who may be eligible for an examination:

If a certificant violates the National Healthcare Certification Organization's (NHCO) policies and punishment is determined appropriate by the Committee, and the individual is eligible for, or a candidate in another National Healthcare Certification Organization (NHCO) examination system, the committee may impose punishment upon the individual as both a candidate and as a credentialed person. For example, it would be possible for the committee to disqualify the individual from active status in the annual record and prevent admittance to the examination process due to his or her violation of the National Healthcare Certification Organization (NHCO) policies.

2. Where an individual has committed one of the offenses described in Item 5 of Part A, the Committee shall, in its judgment, impose one of the following disciplinary actions:

a) Deletion from "active" credentialed status for a period of time equal to the length of the punishment imposed by the court or state agency or as was

voluntarily agreed to by the individual in the case of a voluntary surrender of their license or certificate. During the period of deletion from the record, the individual shall not use any official designation for any purpose whatsoever.

- b) Suspension of a credential(s) for a period of time equal to the length of the punishment imposed by the court or state agency or as was voluntarily agreed to by the individual in the case of a voluntary surrender of their license or certificate. During the period of deletion from the record, the individual shall not use any official designation for any purpose whatsoever.
- c) Suspension from the examination system(s) for a period of time equal to the length of the punishment imposed by the court or state agency or as was voluntarily agreed to by the individual in the case of a voluntary surrender of their license or certificate. During the period of deletion from the record, the individual shall not use any official designation for any purpose whatsoever.
- d) Mandatory reexamination to document continued competence as a credentialed practitioner - failure of the examination could lead to suspension of a credential for an indefinite or specified period of time.

F. Non-Retaliation

The National Healthcare Certification Organization (NHCO) strictly prohibits retaliation against any individual who submits a complaint or report in good faith under this policy or any other NHCO policy. Retaliation includes, but is not limited to, adverse actions, intimidation, harassment, or discrimination directed at a complainant, witness, or any individual who participates in an investigation or disciplinary proceeding.

Any individual found to have engaged in retaliatory conduct will be subject to disciplinary action under this policy, up to and including removal from the examination process, revocation of certification, or removal from service, as applicable.

All appeals are tracked and documented accordingly to include any and all actions undertaken regarding them.

National Healthcare Certification Organization (NHCO) Document Retention Policy

The records of the National Healthcare Certification Organization (NHCO) are important to the proper functioning of the organization, as those records include all documents produced by the organization, both electronic and paper. The objective of this document retention policy is to:

- Retain important documents for reference and future use.
- Ensure that the applicant's, candidate's, and certificant's privacy is maintained.
- Delete documents that are no longer necessary for the proper functioning of the organization.
- Organize important documents for efficient retrieval.
- Assure that the National Healthcare Certification Organization (NHCO) documents are properly retained for the appropriate amount of time, stored adequately, and destroyed appropriately.

For the purposes of this policy, “records” refers to all business records of the National Healthcare Certification Organization (NHCO), including written, printed, and recorded materials, as well as electronic records (i.e., emails and documents saved electronically). All business records shall be retained for a period no longer than necessary for the proper conduct and functioning of the organization. No business records shall be retained longer than five (5) years, except those specifically defined by this policy.

Types of Records

All documents of the National Healthcare Certification Organization (NHCO) shall be classified into three types: Temporary Records, Final Records, and Permanent Records.

Temporary Records

Temporary records include all business documents that have not been completed. These include, but are not limited to, written memoranda and dictation to be typed in the future, reminders,

to-do lists, reports, case studies, calculation drafts, interoffice correspondence regarding client or business transactions, and ongoing logs.

Temporary records can be destroyed or permanently deleted if in electronic format when a project/case/file is closed. Upon closing a project/case/file, all such temporary records will be gathered and reviewed. Before the destruction or permanent deletion of these documents, copies of any/all final records pertaining to the project/case/file shall be made and maintained.

Final Records

Final records include all business documents not superseded by modification or addition. These include, but are not limited to, documents given (or sent via electronic form) to any third party not employed by the organization, final memoranda and reports, correspondence, handwritten telephone memoranda not further transcribed, minutes, design/plan specifications, journal entries, cost estimates, etc. All accounting records are deemed final records.

Except as provided for in this document, all final documents are to be discarded ten (10) years after the close of a project/case/file.

Permanent Records

Permanent records include all business documents that define the organization's scope of work, expressions of professional opinions, research materials, and reference materials. These include, but are not limited to, contracts, proposals, materials referencing expert opinions, annual financial statements, federal tax returns, payroll registers, copyright registrations, patents, etc.

All permanent documents are to be retained indefinitely except as outlined in this document.

It is the policy of the National Healthcare Certification Organization (NHCO) to maintain the documents listed below for the following retention periods:

Accounts Payable and Receivable.....	7 Years
Appointment Books.....	3 Years
Articles of Incorporation.....	Permanently
Audit Reports.....	Permanently
Bank Statements.....	7 Years
Bylaws.....	Permanently

Candidate Records and Certificant Information (hard copy).....	7 Years
Candidate Records (electronic).....	Permanently
Exam Results	Permanently
Exam Creation Documents.....	Permanently
Expired Authorization to Test Records (hardcopy).....	1 Year
Failed Candidate Records (hardcopy).....	1 Year
Checks (canceled and voided).....	7 Years
Checks (canceled for taxes, property purchases, special contracts).....	Permanently
Conflict of Interest Agreements.....	7 years
Conflict of Interest Disclosure Forms.....	7 years
Contracts and Leases (current and expired).....	Permanently
Copyrights, Trademarks, Registrations, Patents.....	Permanently
Correspondence (routine, with clients and vendors).....	1 Year
Correspondence (general).....	3 Years
Correspondence (legal, to include client complaints).....	Permanently
Deeds, Mortgages, Bills of Sale.....	Permanently
Depreciation Schedules.....	Permanently
Duplicate Deposit Slips.....	1 Year
Employee Expense Reports.....	7 Years
Employee Handbooks.....	Permanently
Employee Payroll Records.....	7 Years
Employee Personnel Records (after termination).....	6 Years
Employment Applications.....	3 Years
Financial Statements.....	Permanently
General Ledgers.....	Permanently
Insurance Policies (expired).....	3 Years
Insurance Records (accident reports, claims, etc.).....	Permanently
Internal Audit Reports.....	Permanently
Internal Reports (miscellaneous).....	3 Years
Inventories.....	7 Years
Investment Reports.....	Permanently
Invoices to Clients.....	7 Years
Invoices from Vendors.....	7 Years
Minutes.....	Permanently

Payroll Records, Summaries, Tax Returns.....	7 Years
Pension, Profit Sharing Information, Returns, and Correspondence.....	Permanently
Property Records.....	Permanently
Purchase Orders.....	Permanently
Safety Records.....	6 Years
Sales Records.....	1 Year
Stenographers Notebooks.....	1 Year
Tax Returns, Worksheets, etc.....	Permanently
Time Cards and Reports.....	7 Years
Vouchers (payments to vendors, reimbursements, travel expenses).....	7 Years

Email Records

Email systems are communication devices, not record-keeping systems. Messages are sent via email, and documents can be distributed, but the system itself should not be used to store these records. Email retention is based on content, not the media it resides in. Important documents and communications should be:

- (1) deleted if their retention period has passed.
- (2) printed and filed appropriately, the email deleted, and the hard copy kept for the applicable retention period, OR
- (3) "archived" in the email system until
 - [a] the retention period has lapsed for records with a retention of 18 months or less OR
 - [b] the project or activity has been completed. Records should be printed and filed at the end of the project/activity, and the email deleted from the system.

For the purposes of this policy, email correspondence can be classified in the following manner:

- 1. Accounting Correspondence: Documents pertaining to all financial, tax, and investment areas.

ACTION: Record, print, file, delete email, retain for seven years.

- 2. Administrative Correspondence: Communications received or sent that contain significant information about the National Healthcare Certification Organization (NHCO) programs.

- May include: letters sent and received, memoranda, notes, enclosures, and attachments.

ACTION: Print, file, delete email, and retain hard copy for five years.

3. Ephemeral Correspondence: Records of a preliminary or informational nature received or sent that do not contain significant information about the National Healthcare Certification Organization (NHCO) programs, fiscal status, or routine operations.

ACTION: Delete after reading.

4. Executive Correspondence: Documents significant events and the development of administrative structure, policies, and procedures of the office.

- May also record the historical development of the office.
- May include: letters sent and received, notes, directives, acknowledgments, and memoranda.

ACTION: Print, file, delete email, and retain hard copy permanently. Other copies print, file, delete email, and retain for two years.

5. General Correspondence: Communications received or sent that do not contain significant information about National Healthcare Certification Organization (NHCO) programs.

- May include: letters sent and received, memoranda, notes, transmittals, acknowledgments, community affairs notices, charity fund drive records, routine requests for information or publications, enclosures, and attachments.

ACTION: Archive in the system for one year and delete; or print, file, delete email, and retain hard copy for one year.

Privacy

Confidential information is protected by federal, state, and local laws or regulations. To protect the privacy of all NHCO candidates, the NHCO's database of personal information is accessible only to authorized staff and personnel. All confidential information will not be disclosed without express written consent from the individual candidate unless required by law or court order.

National Healthcare Certification Organization (NHCOC) General Credentialing Board Appointment and Term Policy

As stated in the National Healthcare Certification Organization (NHCOC) Bylaws, appointment and term positions on the General Credentialing Board will be conducted as follows:

2.3 Qualifications. Except as otherwise provided herein, the “Directors” serving on the General Credentialing Board shall be comprised of professionals working in the healthcare industry, including, without limitation, physicians, nurses, technicians, practitioners, facility administrators and supervisors, educators, insurance providers, etc. One (1) Director serving on the General Credentialing Board shall be a “Public Director” in order to provide insight and expertise outside of the healthcare industry.

2.4 Number. The number of Directors serving on the General Credentialing Board shall be no less than three (3), as determined from time-to-time by the then-existing General Credentialing Board.

2.5 Term.

(a) Each Director shall serve for a term of three (3) years.

(b) The terms of office shall be staggered such that approximately one-third (1/3) of the Directors, and at least one (1) of the Directors, is appointed annually; accordingly, the initial terms of some Directors shall be less than three (3) years.

(c) With the exception of the Public Director, no Director shall serve more than two (2) consecutive three (3) year terms, although a Director may serve two (2) consecutive three (3) year terms after serving the remainder of a term of less than three (3) years (including an initial term when the General Credentialing Board is first organized or later expanded, or an interim appointment to fill a mid-term vacancy). A Director, other than the Public Director, may be reappointed to serve at a later date in time as long as they do not serve more than two (2) consecutive three (3) year terms.

(d) No Public Director shall serve consecutive three (3) year terms, although a Public Director may serve a full three (3) year term after serving the remainder of a term of less than three (3) years (including an initial term when the General Credentialing Board is first organized or later expanded, or an interim appointment to fill a mid-term vacancy). A Public Director may be reappointed to serve at a later date in time as long as they do not serve consecutive three (3) year terms.

2.6 Appointment & Nomination.

(a) Each Director serving on the General Credentialing Board shall be appointed by a majority of the then-current, disinterested Directors. Any Director whose term has expired or will expire in conjunction with the newly appointed Director taking office, and is a candidate to be re-appointed, shall not participate in any such appointment; however, a Director whose term has expired or will expire in conjunction with the newly appointed Director taking office, but is not a candidate for re-appointment, may participate in such appointment.

(b) A "Nominating Committee," chaired by a member of the General Credentialing Board who is not up for re-appointment, shall be organized prior to the annual meeting of the General Credentialing Board for the purpose of soliciting applications and nominations for candidates to fill upcoming vacancies in the General Credentialing Board. No individual serving on the Nominating Committee may be nominated by the Nominating Committee as a candidate for appointment to the General Credentialing Board.

(c) The Nominating Committee shall submit a written recommendation to the General Credentialing Board prior to the annual meeting of the General Credentialing Board containing the names of recommended candidates to fill the upcoming vacancies in the General Credentialing Board. The Nominating Committee shall nominate at least as many candidates as the upcoming vacancies, but may nominate more than the number of vacancies.

(d) No person shall be nominated for appointment or shall be appointed as Director at any annual meeting unless nominated as provided for above, or unless the Directors present at the annual meeting unanimously consent to such person's name being placed in nomination at the annual meeting.

2.7 Resignation, Removal & Vacancies.

(a) Any Director may resign from the General Credentialing Board at any time by giving written notice of such resignation to the remaining Directors and the Executive Director.

(b) A majority of the disinterested Directors of the General Credentialing Board may remove a Director at any time, with or without cause, provided that written notice of such proposed action be given to all Directors at least ten (10) calendar days prior to the meeting at which such removal is to be considered.

(c) If any Director fails to attend any three (3) consecutive meetings or one-half (1/2) of the meetings of the General Credentialing Board in any consecutive twelve (12) month period, such Director may be removed from the General Credentialing Board by the other members of the General Credentialing Board.

(d) A majority-in-interest of the Members of National Healthcare Certification Organization may remove a Director at any time with or without cause, with or without notice.

(e) Each Director shall comply with the Conflict of Interest Policy, as the same may be amended from time-to-time, and may be subject to removal for a violation of the Conflict of Interest Policy, as set forth in the Conflict of Interest Policy.

(f) The General Credentialing Board shall appoint a replacement Director to fill any vacancy on the General Credentialing Board. Any Director so appointed shall serve as a Director for the remainder of the unexpired term of office.

2.8 Chair. The Directors of the General Credentialing Board shall appoint a Chair, who shall serve an indefinite term at the will of the Directors.

(a) The Chair shall give direction and oversee the business and affairs of the General Credentialing Board and shall perform such other duties as may be prescribed from time-to-time by the General Credentialing Board.

(b) The Chair shall preside over all meetings of the General Credentialing Board. In the absence of the Chair at any meeting, the other Directors shall appoint an interim Chair for purposes of that meeting.

Statement of Impartiality

The National Healthcare Certification Organization (NHCO) is fully committed to conducting all of its certification activities with the highest degree of impartiality, integrity, and fairness. NHCO recognizes that impartiality is essential to ensure public confidence in its certification programs, its governance processes, and the credibility of its credentials.

To protect this principle, NHCO has established and maintains a robust framework that actively identifies, monitors, and manages any risks to impartiality. This includes:

- Ensuring that all decisions related to certification, policy development, disciplinary actions, and appeals are made free from undue influence or bias.
- Requiring all Board members, committee members, volunteers, and staff to disclose actual, potential, or perceived conflicts of interest and recuse themselves from decisions where impartiality could be compromised. See the Recusal Process contained in Policy 34.0 - Mitigation of Conflict and Recusal Policy.
- Prohibiting commercial, financial, or other pressures that could improperly affect certification decisions or organizational policies.
- Promoting transparency in all policies, procedures, and decision-making processes.
- Maintaining clear boundaries between organizational functions to ensure fairness and impartiality.
- Requiring adherence to a formal Code of Conduct and Conflict of Interest Policy for all individuals involved in NHCO operations.

NHCO regularly reviews and improves its impartiality safeguards as part of its commitment to

continuous quality improvement and stakeholder trust. All individuals involved in NHCO's certification processes share responsibility for upholding these standards.

National Healthcare Certification Organization (NHCO) Ethical Behavior and Conduct Policy

Individuals choosing to serve the National Healthcare Certification Organization (NHCO) are held to the highest standards of professional conduct and ethics. They must serve the organization without personal gain and must exhibit behaviors that enhance public trust and confidence in the National Healthcare Certification Organization (NHCO). All individuals who serve as volunteers or staff are bound to standards of conduct as defined by organizational bylaws and policies. Violations of those standards shall be grounds for the recommendation of removal from the organization by the National Healthcare Certification Organization (NHCO) General Credentialing Board. Any Member may be removed at any time, either with or without cause, by the General Credentialing Board.

The National Healthcare Certification Organization (NHCO) volunteers and staff should abide by the following Code of Conduct:

- Demonstrate conduct to promote the Mission and Vision of the National Healthcare Certification Organization (NHCO).
- Adhere to the National Healthcare Certification Organization (NHCO) Bylaws, Policies, and Procedures at all times when conducting business in any capacity.
- Maintain confidentiality of the National Healthcare Certification Organization (NHCO) business and matters under review or investigation at all times. Refrain from discussing the specifics of any case with anyone other than the following individuals: fellow Board and/or Committee members, legal counsel or their designee, and appropriate National Healthcare Certification Organization (NHCO) staff.
- Exhibit honesty, loyalty, candor, and professional competence in relationships with the National Healthcare Certification Organization (NHCO) volunteers, constituents, and staff.
- Assist the National Healthcare Certification Organization (NHCO) General Credentialing Board, Exam Review Committee Members, and staff in creating and maintaining an effectively functioning organization, always respecting the responsibility and authority of those to whom implementation of organization policies and goals has been entrusted.

- Give prudent consideration to issues affecting the National Healthcare Certification Organization (NHCO), considering established organizational policies, the need for confidentiality regarding proprietary and sensitive information, and the legal, financial, and administrative effects of proposed actions.
- Inform the National Healthcare Certification Organization (NHCO) General Credentialing Board regarding matters of which the organization may be unaware, including but not limited to, business opportunities, policy alternatives, organizational needs, or any actions that may be contrary to organizational policy, unethical, unlawful, or may be potentially damaging to the National Healthcare Certification Organization (NHCO).
- Respect the concerns of the National Healthcare Certification Organization (NHCO) constituents and ensure that all concerns are forwarded to the appropriate staff.
- Refrain from any behavior that may be considered discriminatory, harassing, or unprofessional, including verbal or written communications with volunteers, constituents, and staff of the National Healthcare Certification Organization (NHCO).
- Not engage in conduct which, in the opinion of the other General Credentialing Board Members, is considered prejudicial to the best interests of the organization.

Upon determination of a potential violation of the above Code of Conduct, the Executive Director will determine the appropriate disciplinary policy and procedure to address the concern. If the allegation involves a volunteer of the National Healthcare Certification Organization (NHCO), the Executive Director will contact the volunteer to initiate a dialogue related to the concern. The Executive Director will be responsible for presenting the concern and subsequent discussion to the General Credentialing Board at their next scheduled meeting. The volunteer in question may exercise the right to present their case during the General Credentialing Board's review and must be notified beforehand of the General Credentialing Board's intent to review the concern. The General Credentialing Board will be responsible for the ultimate determination and for an appropriate course of action. Any disciplinary action related to a member of the General Credentialing Board or Exam Review Committee must be approved by a majority vote of the General Credentialing Board. The Executive Director will be responsible for notifying any volunteer of the Board's action on any matter.

If the allegation involves the Executive Director, the Committee Chair and the General Credentialing Board will address the concerns. The National Healthcare Certification Organization (NHCO) staff will be responsible for presenting the concern and subsequent discussion to the General Credentialing Board.

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National Healthcare Certification Organization (NHCO) Examination and Renewal Refund Policy

The National Healthcare Certification Organization (NHCO) does not refund examination fees (if applicable) if the candidate is denied eligibility or withdraws their application before the approval/denial of the requested examination. No refunds are issued after the application's approval and after data has been transferred between the National Healthcare Certification Organization (NHCO) and its contracted testing agency. If a candidate begins an attempt and chooses not to complete the exam, the attempt will be considered forfeit, and a new attempt must be purchased.

The National Healthcare Certification Organization (NHCO) does not refund renewal application fees (if applicable) if the candidate is denied or withdraws their application prior to the approval/denial of the requested certification renewal. Additionally, no refunds will be given for reinstatement fees (if applicable) if the candidate is denied or withdraws their application prior to the approval/denial of the requested certification renewal.

The National Healthcare Certification Organization (NHCO) does not refund examination fees if the candidate is found to be in violation of the Policy 28.0 – Examination Security Policy.

Any approved refunds will be returned in the name of the individual who made the payment and via the original payment method.

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National Healthcare Certification Organization (NHCOC) Fee Schedule Policy

The National Healthcare Certification Organization (NHCOC) fees as of January 1, 2026, are as follows:

- Certification Practice Exam: \$40.00
- Certification Study Materials: \$50.00
- Certification Preparation Package: \$75.00
- Certification Examination Fee: \$125.00
- Second Certification Examination Attempt Fee: \$125.00
- Third Certification Examination Attempt Fee: \$125.00
- Certification Renewal Fee Per Renewal Period (Every Two Years): \$100.00
- Appeal Fee: \$25.00
- Name Change Fee: \$25.00
- Reinstatement Fee: \$25.00

In addition to the required \$100.00 Certification Renewal Fee, a Reinstatement Fee will be applicable for all candidates who hold an expired certificate at the time of renewal.

National Healthcare Certification Organization (NHCO) Payments and Accounting Policy

Purpose

This policy establishes clear procedures for managing candidate payment issues, including refund requests, chargebacks, payment fraud, and related accounting controls. It also ensures that the NHCO remains compliant with legal and regulatory requirements and industry best practices while upholding transparency and financial accountability.

Refunds and Promotional Code Errors

Refunds are issued to the original payment method unless unavailable, in which case an alternative arrangement will be made.

A. Promotional Code Application:

NHCO recognizes that promotional code application errors may occur during checkout. Candidates who believe a promotional code was not successfully applied must contact NHCO support to request a review. All requests will be evaluated in accordance with the refund eligibility criteria outlined below.

B. Refund Eligibility:

Candidates may request a refund within 30 calendar days of purchase if a promotional code was not applied at checkout. Refunds will only be issued when:

- The product or service (e.g., exam or renewal) has not yet been used, and
- The candidate provides reasonable documentation supporting the error, including evidence that a valid promotional code existed and was applicable to the purchase at the time of the transaction

Refunds will not be issued for promotional codes obtained after purchase.

C. Refund Types

- **Full Refund:** For orders mistakenly processed in full with no service rendered
- **Partial Refund:** For valid promotional code issues where service has not yet begun

- **Denied Refund:** When the product or service has been accessed or initiated

Chargebacks and Payment Disputes

A. Impact on Certification and Exam Eligibility

- If a candidate initiates a chargeback or disputes a transaction as fraudulent:
 - Their application(s) for exams, renewals, or other services will be put on hold
 - No further approvals will be granted until the dispute is resolved and payment is received

B. Certificate Status During Disputes

- If a renewal payment is disputed, the candidate's certification will be immediately suspended pending resolution
- If the merchant provider does not release the funds to the NHCO, the certification will be revoked

C. Reapplication After a Dispute

- Candidates who previously filed a chargeback or fraud claim may apply again only after all outstanding payments have been resolved in full. The NHCO may require future payments to be made via secured methods (e.g., bank transfer, certified funds).

Fraudulent Activity and Misrepresentation

A. Definition of Fraudulent Behavior

- The NHCO defines fraud as any intentional deception, misrepresentation, or illegal act that results in unauthorized benefit to an individual or group. This includes, but is not limited to:
 - Use of stolen or unauthorized payment methods
 - False claims of identity
 - Providing altered or fake documentation
 - Filing unsubstantiated chargebacks after receiving service

B. Consequences of Fraud

- Confirmed fraud may result in:
 - Immediate revocation of certification
 - Permanent ineligibility for future certification

- Legal referral to appropriate authorities
- Notification to employers, regulatory agencies, and background check providers

Internal Controls for Accounting and Financial Integrity

The NHCO is committed to maintaining strong internal controls to ensure responsible financial management, transparency, and prevention of fraud or misappropriation of funds.

A. Separation of Duties

- Financial processes are designed to ensure no single individual controls all aspects of a transaction (authorization, processing, and reconciliation)
- Duties are segregated among staff responsible for payment intake, refund issuance, account reconciliation, and oversight reporting

B. Transaction Review and Approval

- All refunds and adjustments must be reviewed and approved by at least one staff member other than the processor
- A monthly reconciliation of all merchant accounts is conducted by designated accounting personnel and reviewed by leadership

C. Recordkeeping

- All financial transactions, including refunds, chargebacks, and fee payments, are logged and stored for a minimum of five years
- Supporting documentation must accompany each refund, chargeback response, or adjustment

D. Audit and Compliance

- The NHCO conducts annual internal audits and engages external auditors as needed
- Any irregularities discovered during the audit process will be escalated to the General Credentialing Board and may result in disciplinary or legal action

Candidate Notifications and Resolution Process

- Candidates will be notified by email (and/or phone) within 10 calendar days after the NHCO is alerted to a chargeback, fraud claim, or payment issue.
- Candidates will be given a seven-day window to respond and resolve the issue

- If unresolved, the NHCO reserves the right to suspend or revoke certification, block access to services, and notify relevant parties.

Appeals

- Candidates may appeal any decision related to a denied refund, fraud finding, chargeback-related suspension, or revocation. Appeals must be submitted through the candidate's NHCO online portal within 30 calendar days and follow Policy 3.0 – Appeals Policy.

National Healthcare Certification Organization (NHCO) CPT Mark, NHCO Logo, and Title Usage Policy

The “Certified Phlebotomy Technician” (CPT) mark below is pending to become a registered trademark of the National Healthcare Certification Organization (NHCO) and may only be used by individuals who have taken and passed the national certification examination for phlebotomy and hold a current valid certification issued by the National Healthcare Certification Organization (NHCO). No other usage of this mark may occur without the expressed written approval of the National Healthcare Certification Organization (NHCO).



The National Healthcare Certification Organization (NHCO) staff will assist by providing certificants with the applicable certification mark. Certificants are encouraged to incorporate this mark into their stationery, business cards, published advertising in industry publications, flyers, and other announcements to the profession and industry.

Anyone using the National Healthcare Certification Organization (NHCO) logos is urged to use these materials appropriately for their business and clientele. The following guidelines are to be followed when using any of the National Healthcare Certification Organization (NHCO) approved logos:

1. Any reprinting, sublicensing, copying, altering, publishing, assignment, transfer, sales, or other distribution of the logos is strictly prohibited without the prior written permission of the National Healthcare Certification Organization (NHCO).
2. The user shall not copy, reverse engineer, translate, port, modify, or make derivative works of the logos without express written permission from the National Healthcare Certification Organization (NHCO).
3. All National Healthcare Certification Organization (NHCO) logos are to be used "as they appear" and are not to be dissected, rearranged, altered, modified, or recreated with other

typefaces without express written permission from the National Healthcare Certification Organization (NHCO).

4. Because the size and spatial relationships of the letters in the wordmark are part of the overall design and function as a part of each complete logo, distortion of the logos in any way (outlining, reorienting, stretching, or arching) is unacceptable. The National Healthcare Certification Organization (NHCO) logos may be resized as needed, but the ratios of wordmark to graphic must remain the same.
5. Do not shrink the logos so much that the wordmark becomes illegible.
6. The National Healthcare Certification Organization (NHCO) logos may not appear as part of an integrated design. They may not be partially obscured by or overlap other design elements, including type and/or graphics.
7. All National Healthcare Certification Organization (NHCO) logos remain the property of the National Healthcare Certification Organization (NHCO). Unauthorized usage of the logos or failure to comply with any of the terms, restrictions, conditions, or limitations herein will result in a denial of future usage or legal action to prevent unauthorized use and to recover damages.

Certified Phlebotomy Technician (CPT)

The National Healthcare Certification Organization (NHCO) certificants should avail themselves of appropriate opportunities to publicize their certification and are encouraged to incorporate their certifications into their stationery, business cards, advertising, flyers, and other announcements to the profession and industry. The following guidelines are to be followed when using any of the National Healthcare Certification Organization (NHCO) titles:

1. The term “Certified Phlebotomy Technician (CPT)” must be utilized when referring to certification. Only the mark below or the terms above are allowed to convey the National Healthcare Certification Organization (NHCO) certification.
2. A person who has made unauthorized use of the National Healthcare Certification Organization (NHCO) title, or who has allowed themselves to be represented, in any manner, to be certified when such is not the case, will be subject to legal and disciplinary proceedings.
3. When communicating with the media, the full title, National Healthcare Certification Organization (NHCO), must be used for the first reference.
4. The mark below, when used, must not be altered in any way, shape, or form other than size.



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National Healthcare Certification Organization (NHCO) Meeting Record Policy

All meetings of the National Healthcare Certification Organization (NHCO) General Credentialing Board, the Exam Review Committee, and any Specialty Committees, as appropriate, shall be logged and permanently maintained by the organization in the form of written minutes. It shall be the responsibility of the appropriate designated Member to make note of deliberations at all meetings of the General Credentialing Board, the Exam Review Committee, and any Specialty Committees, and provide all such notes to the National Healthcare Certification Organization (NHCO) staff for development of meeting minutes. Staff will concurrently maintain notes of each meeting.

The National Healthcare Certification Organization (NHCO) staff shall provide the Committee Chair with an initial draft of meeting minutes no later than 14 calendar days after the meeting for correction and editorial comment(s).

The Committee Chair shall have 14 calendar days to forward corrections and editorial comments to Members.

The National Healthcare Certification Organization (NHCO) staff will revise meeting minutes, as appropriate, to the Committee Chair's corrections and editorial comments and distribute them to the full General Credentialing Board, the Exam Review Committee, and any Specialty Committees within thirty (30) days of receiving the Committee Chair's corrections and editorial comments for any additional corrections and editorial comments.

The National Healthcare Certification Organization (NHCO) General Credentialing Board, the Exam Review Committee, and any Specialty Committees, as appropriate, will have 7 calendar days to return any corrections or comments.

All minutes will be approved by the General Credentialing Board, the Exam Review Committee, and any Specialty Committees, as appropriate, at the next scheduled meeting.

National Healthcare Certification Organization (NHCO) Examination Retake Policy

Purpose

This policy outlines the procedures, requirements, and limitations for candidates who do not pass a National Healthcare Certification Organization (NHCO) examination on their initial or subsequent attempts. It ensures a fair and consistent process while maintaining the integrity of NHCO certifications.

I. First and Second Exam Attempts

Candidates who do not pass the examination on their first attempt may apply to retake the exam after a minimum waiting period of 10 calendar days from the date of their most recent examination. This allows the candidate to review any materials they deem beneficial after the first attempt and ensures that NHCO administrative staff have the necessary time to review and approve candidates' retake applications.

- A new examination application and associated fee must be submitted through the candidate's NHCO online account.
- The examination must be completed within 30 calendar days of the retake application's purchase date. If the examination is not completed within this period, the application will expire and a new application and associated fee will be required.

If a candidate does not pass the examination on the second attempt, the same timeline, application, and fee requirements apply.

II. Third Attempt

Candidates may attempt the examination a third time under the same conditions as above:

- A minimum waiting period of ten calendar days applies between the second and third attempts.
- A new application and fee are required for each attempt.
- The exam must be taken within 30 calendar days of the application purchase date.

III. Remedial Training Requirement and Fourth Attempt

Candidates who fail the examination three times must complete remedial training and meet the minimum waiting period of ten calendar days before becoming eligible for a fourth attempt.

Remedial Education Criteria:

Candidates must complete **one** of the following:

- A structured remedial course through a state- or federally-approved training program **or**
- A minimum of twenty hours of documented remedial education in the subject matter areas outlined in the candidate's previous examination results.

Documentation must include:

- Course outline or syllabus
- Instructor contact information
- Proof of completion (e.g., certificate or signed training log)

All documentation must be uploaded through the candidate's official NHCO portal at <https://portal.NHCOcert.com> and is subject to verification or audit. Falsified or incomplete documentation may result in disqualification from further testing or certification.

IV. Fourth Through Sixth Attempts

Upon verification of completed remedial education:

- Candidates may take the examination up to three additional times (Attempts 4–6).
- A minimum of ten calendar days is required between each attempt.
- A new application and fee must be submitted for each attempt.
- Each exam must be completed within 30 calendar days of the application purchase date.

V. Final Attempt Limit

Candidates are permitted a maximum of six attempts to pass the examination.

Candidates who do not pass the examination within six attempts will be required to restart the certification process in full, including:

- Re-enrolling in and completing a full initial training course approved by a state or federal agency **AND**
- Submitting new documentation of course completion **AND**

- Reapplying for certification with a new application and fee.

VI. Appeals and Exceptions

Candidates may request a review of their examination history or retake eligibility by submitting a formal appeal to NHCO within 30 calendar days of receiving a denial or limit notification.

Appeals must include:

- Candidate name and ID number
- Description of the issue or hardship
- Supporting documentation

NHCO reserves the right to grant or deny exceptions on a case-by-case basis in accordance with organizational policies and applicable laws.

National Healthcare Certification Organization (NHCO) Orientation Policy

The National Healthcare Certification Organization (NHCO) will hold an orientation session for new Board and Committee Members annually. Full Board and Committee orientation sessions will be held every three (3) years.

The National Healthcare Certification Organization (NHCO) Board and Committee Orientation Procedures:

1. An official welcome letter with initial information will be sent within three (3) weeks after the appointment from the Executive Director.
2. The National Healthcare Certification Organization (NHCO) will contact all new Board and Committee Members within three (3) weeks of the appointment to offer a personal welcome, answer additional questions, and provide information regarding the orientation session.
3. The annual orientation session will be scheduled as soon as appropriate following the annual Board and Committee appointments.
4. The orientation materials shall include, but are not limited to, the following:
 - Organization Mission, Values, and Strategic Objectives
 - Organization Bylaws and Policies/Procedures
 - General Guidelines for Board and Committee Members
 - Code of Conduct
 - Board and Committee Rosters
 - Appropriate Job Descriptions
 - Leadership Team Contact Information
 - Confidentiality Agreement
 - Consent to Serve
 - Upcoming Meeting Dates
 - Orientation Presentations

5. New appointees must attend the next National Healthcare Certification Organization (NHCO) orientation session. If a new appointee is unable to attend the scheduled orientation, an alternative arrangement will be made by the Executive Director.
6. New board appointees will be recommended to attend the next available accrediting body workshops or events with the Executive Director or other staff.

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**National Healthcare Certification Organization (NHCO)
Policy Development, Maintenance, and Approval Policy**

The National Healthcare Certification Organization (NHCO) strictly develops, reviews, and maintains all policies approved and established by the General Credentialing Board. Policies are thoroughly reviewed once per year at an annual meeting.

Each policy that is developed is presented to the General Credentialing Board for review and approval. Policies are voted on by the General Credentialing Board and subsequently implemented by the Executive Director of the National Healthcare Certification Organization (NHCO).

National Healthcare Certification Organization (NHCO) Verification of Certification Policy

The National Healthcare Certification Organization (NHCO) has a responsibility to make available to the public the names and certification numbers of individuals who become certified by successfully passing any of the certification examinations offered through the NHCO, and to verify the current status of each certificant. This verification is done by a third party, such as an employer, background check service, or other third-party information verification service. This will include the current status of the certificant, which will be one of three (3) statuses listed below:

- Active and in good standing with no disciplinary action
- Expired (with date)
- Suspended based on disciplinary action

Third-Party Procedures for Certificate Verification

Upon written request, either by mail or email, the National Healthcare Certification Organization (NHCO) shall provide the certification number, certification date, and next certification expiration date for certified individuals. The National Healthcare Certification Organization (NHCO) will also provide this information via the certification verification portal on the National Healthcare Certification Organization (NHCO) website. Since certification is a voluntary process, the National Healthcare Certification Organization (NHCO) can provide information on individuals whose certification has expired when utilizing the certification verification portal on the National Healthcare Certification Organization (NHCO) website.

Every effort will be made to ensure that certification information is provided for the correct individual. This will be accomplished by requesting the following identifying information:

- First and last name
- Email address
- Certification number, if known
- Year tested

This data will only be released WITH proof that the requesting party has been granted permission by the certificant to access the information. This can be a job application, a signed consent form for a background check, or a consent for personal information.

Certificants Requesting Their Own Information

Certificants can contact the National Healthcare Certification Organization (NHCO) staff with specific information. Once their identity has been established, staff will provide them with the requested information.

National Healthcare Certification Organization (NHCO) Whistleblower Policy

Unidentified illegal practices or violations of the National Healthcare Certification Organization (NHCO) policies are detrimental to the organization's mission, vision, and purpose. To create effective organizational operations, the National Healthcare Certification Organization (NHCO) has established the Whistleblower Policy to:

- Encourage employees to come forward with credible information detailing any illegal practices or serious violations of adopted policies.
- Specify protection of the person from retaliation by available and reasonable means.
- Identify to whom the information should be reported.

It is the responsibility of all employees and volunteers to comply with the National Healthcare Certification Organization (NHCO) policies, all applicable laws and regulations, and to report violations or suspected violations in accordance with the Whistleblower Policy.

Violation Reporting

The National Healthcare Certification Organization (NHCO) utilizes an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, the Executive Director is best positioned to address an area of concern. The Executive Director has a specific and exclusive responsibility to investigate all reported violations. If an employee is not satisfied or comfortable with following the organization's open-door policy, the employee should contact the current Committee Chair of the General Credentialing Board. If the complainee is the Committee Chair, the employee should contact the organization's Compliance Member. The Compliance Member shall be the current Public Member of the General Credentialing Board.

Handling of Reported Violations

The Executive Director will notify the person who submitted the matter for investigation and acknowledge receipt of the reported violation or suspected violation within five (5) business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation, in accordance with applicable Bylaws, Policies, and Procedures of the National Healthcare Certification Organization (NHCO).

Anti-Retaliation

No employee who reports a violation in good faith shall suffer harassment, retaliation, or adverse employment consequences. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees to raise serious concerns within the organization before seeking resolution outside the organization.

Confidentiality

Violations or suspected violations may be submitted anonymously or confidentially by the complainant. Reports of violations or suspected violations will be kept confidential to the greatest possible extent and consistent with the need to conduct an adequate investigation.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation must act in good faith and have reasonable grounds for believing the disclosed information indicates a violation. Any allegations that prove to be unsubstantiated, have been made maliciously, and/or are knowingly false are considered to be serious disciplinary offenses. All General Credentialing Board and Exam Review Committee Members are required to cooperate and to respond accurately, completely, and promptly to requests for information, and to preserve records that may be related to a compliance investigation.

Disciplinary Action

Employees or volunteers who engage in a violation(s), whether by improper acts, failure to act, condoning or failing to report improper acts or failures to act by others, or retaliation against any individual who reported or cooperated in an investigation of an alleged violation, are all subject to disciplinary action up to and including termination of employment for cause. Depending on the nature of the alleged violation and the position or capacity in which the person who committed the alleged violation serves, disciplinary action may be taken under the National Healthcare Certification Organization (NHCO) Bylaws or applicable Policies and Procedures, as appropriate. Forms of disciplinary action may include verbal or written counseling or warnings, performance improvement plans, suspension, or other forms of disciplinary action up to and including termination of employment or disallowance of any future volunteer involvement with the organization. In considering what discipline is appropriate, the National Healthcare Certification Organization (NHCO) may treat with appropriate leniency persons who come forward to report their own ethics or compliance violations.

National Healthcare Certification Organization (NHCO) Certified Phlebotomy Technician (CPT) Scope Policy

Overview

The Certified Phlebotomy Technician (CPT) certification is designed to promote consistency and accuracy in phlebotomy practice and to certify individuals who demonstrate competency through validated, psychometrically sound examinations offered nationwide.

The purpose of the National Healthcare Certification Organization (NHCO) CPT certification is to ensure that individuals holding the CPT designation maintain current knowledge and skills in alignment with industry standards, demonstrating ongoing professional competence in the field of phlebotomy.

Target Audience

The National Healthcare Certification Organization (NHCO) CPT certification is intended for graduates of state-approved Phlebotomy Training programs from private postsecondary or higher education facilities, as well as individuals who have completed equivalent phlebotomy training through a branch of the United States Military.

I. General Eligibility Criteria

To be eligible for the NHCO CPT examination, an applicant must meet **all** of the following general requirements:

- **Minimum Education**
 - Be a high school graduate or hold a state-recognized equivalent (e.g., GED, HiSET).
 - Documentation: Official high school transcript, diploma, or equivalent credential.
- **Minimum Age**
 - Candidates must be at least 18 years of age at the time of application.
- **Application Submission**
 - All candidates must submit a complete application through the official NHCO portal: www.NHCOcert.com.

- **Eligibility Attestation**

- All applicants must sign the Eligibility Attestation Statement certifying that all submitted information is accurate and truthful under penalty of disqualification or revocation.

II. Eligibility Routes

To be eligible to sit for the National Healthcare Certification Organization (NHCO) Certified Phlebotomy Technician (CPT) exam, a candidate must qualify under **one** of the following two eligibility routes:

Route 1 – Training and Education (Completed Within the Last 4 Years)

- Completion of a phlebotomy training program through:
 - A state-approved or nationally accredited institution; **OR**
 - A branch of the United States Military.
- Required Documentation:
 - Certificate of completion or official transcript.
 - The program must include a practical component with documentation of:
 - Minimum 30 successful venipunctures **AND**
 - Minimum 10 successful capillary collections on live individuals.
- Training programs must have been completed within four years of the date of examination application submission.

Route 2 – Employment Experience

- Applicants who have not completed a formal training program may qualify based on verifiable work experience in the field of phlebotomy:

Option A – One Year

- Employed as a full-time Phlebotomy Technician for at least one continuous year within the past two years.

Option B – Two Years

- Employed as a full-time Phlebotomy Technician for at least two cumulative years within the past four years.

- Required Documentation:

Employer Verification: (one of the following)

- A completed employer verification form signed by a supervisor; OR
- An official letter from the HR department confirming employment and total hours worked within the required timeframe

Proof of Hours Worked:

- Pay stubs that clearly show accumulated hours for each applicable period of employment

Clinical Experience Documentation — evidence of at least:

- 30 successful venipunctures, AND
- 10 successful capillary collections performed on live individuals

III. Timelines and Expiration of Eligibility

- **Eligibility Window:** Eligible candidates will have 90 days from the application purchase date to schedule and complete their first attempt at the CPT exam.
- **Reapplication Requirement:** If the candidate does not take or pass the exam within this 90-day window, a new application must be submitted with updated documentation.
- **Document Validity:**
 - **Route 1 (Training and Education):** Training must have been completed within four (4) years of the application submission date
 - **Route 2, Option A:** Employment must have occurred within the past 2 years of the application submission date
 - **Route 2, Option B:** Employment must have occurred within the past 4 years of the application submission date
 - Expired or undated documents will not be accepted.

IV. Fraudulent or Misleading Applications

- Submission of falsified documents or misrepresentation of eligibility may result in immediate disqualification, revocation of credentials, and referral to appropriate authorities for investigation.
- The NHCO reserves the right to audit any submitted documentation and to contact employers or training institutions for verification.

V. Reasonable Accommodations

- The NHCO complies with the Americans with Disabilities Act (ADA) and will provide reasonable testing accommodations upon documented request. See Policy 1.0 - ADA

Accommodations, Non-Discrimination Policy, and Statement of Impartiality Policy for more information.

- Candidates must complete the accommodation request form and wait for an approval notification before taking the certification exam.

VI. Appeals Process

- Applicants who are deemed ineligible may submit a written appeal to the NHCO Executive Director within 30 calendar days of receiving the denial notice.
- Appeals will be reviewed, and a written decision will be provided within 45 calendar days.

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National Healthcare Certification Organization (NHCO) Examination Administration Policy

The National Healthcare Certification Organization (NHCO) certifying examinations shall be administered in an online, securely proctored environment approved by the National Healthcare Certification Organization (NHCO) General Credentialing Board. The National Healthcare Certification Organization (NHCO) staff will review the online testing and proctoring experience annually. Once a candidate is approved for testing, the NHCO will administer the exam and provide subsequent scoring and pass/fail results after reviewing the candidate's data.

The National Healthcare Certification Organization (NHCO) will provide the following services for all National Healthcare Certification Organization (NHCO) examinations:

1. Job Analysis
2. Item Development
3. Form Assembly
4. Form Review
5. Item and Exam Form Statistical Analysis and Review of Flagged Items
6. Standard Setting (Passing Score Study)
7. Equating

The National Healthcare Certification Organization (NHCO) participates in and provides oversight for the development and ongoing maintenance of the CPT certification examination. Examination Review Committee members and Subject Matter Experts will receive sufficient training specific to their assigned roles prior to participating in examination development. Training will be conducted by the National Healthcare Certification Organization's psychometrician.

Job Analysis studies will be conducted to identify and validate the knowledge and skills that will be measured by the examination. The results of the Job Analysis will serve as the basis for the examination. The National Healthcare Certification Organization (NHCO) General Credentialing Board has determined that a job analysis will be conducted every five (5) years based on the recommendation of industry psychometricians. This determination is based on changes in practice, as evidenced by the phlebotomy industry. The content for the examination will be determined based on the recommended content outlined and the content area weights developed following each job analysis. The five-year Job Analysis cycle governs the validation of the content domain — that is, what knowledge and skills are measured by the examination. This is distinct from the ongoing annual process of exam form development, review, and statistical analysis, which occurs

continuously and independently of the Job Analysis cycle. Form-level review ensures that individual items and assembled forms remain current, valid, and psychometrically sound on an ongoing basis.

Recommendations for other exam design considerations, including the number and types of items, length of testing time, etc., are made in partnership with the National Healthcare Certification Organization (NHCO) psychometrician and approved by the General Credentialing Board. Item development and review are conducted as recommended by the psychometrician. The development of all items is linked to the approved content outline. Newly written items are reviewed and pre-tested as unscored items before being included as scored items. An item bank, which includes all items developed for the examination(s), will be maintained. The psychometrician and designated staff will oversee the maintenance and security of the examination item bank. Data for each item stored in the item bank includes current status (e.g., draft, active, retired), correct answer key, content outline linkage, references, and performance statistics.

New test forms are reviewed and launched annually, or more frequently as recommended by the psychometrician. Annual form review and development is conducted independently of the five-year Job Analysis cycle. Draft exam forms will be assembled by the psychometrician to meet the exam specifications and reviewed by a Subject Matter Expert (SME) panel. The passing point for the exam is established using a criterion-referenced technique. Qualified and experienced SMEs will participate in determining the passing point by working with the psychometrician. The process used to determine the passing point will be documented in a report. The recommended passing score will be approved by the National Healthcare Certification Organization's General Credentialing Board.

Standard setting studies are completed after each job analysis, but can be conducted to support programmatic requirements as needed. Specific methodologies for establishing the passing score for exams and ensuring test forms are equivalent will be selected and documented by the psychometrician based on compliance with national accreditation standards. At least annually, a test analysis or technical report will be produced by the psychometrician and reviewed by the National Healthcare Certification Organization (NHCO) to evaluate the viability and effectiveness of the examinations and determine any areas that must be reviewed or revised. At a minimum, the technical reports will include a summary of the exam administration, the number of exam takers, the passing point and number of exam items, measures of average performance, measures of performance variability, reliability indices, pass-fail percentages, and recommendations from the psychometric consultant.

The National Healthcare Certification Organization (NHCO) is the body that officially approves, grants, suspends, or withdraws an individual's certification. Any irregularities in the examination administration should be directed to the National Healthcare Certification Organization (NHCO) Exam Review Committee.

National Healthcare Certification Organization (NHCO) Examination Review Committee Appointment and Term Policy

The National Healthcare Certification Organization (NHCO) General Credentialing Board may appoint as many Exam Review Committee Members as necessary to ensure the validity and integrity of the National Healthcare Certification Organization (NHCO) examination process.

As stated in the National Healthcare Certification Organization (NHCO) Bylaws, appointment and term positions on the Exam Review Committee will be conducted as follows:

3.3 Number. The number of members serving on each Exam Review Committee shall be no less than three (3), as determined from time-to-time by the General Credentialing Board or the Executive Director.

3.4 Qualifications. The members serving on an Exam Review Committee shall be comprised of professionals working in the specific discipline of the healthcare industry that is the subject of the Exam Review Committee, including, without limitation, physicians, nurses, technicians, practitioners, facility administrators and supervisors, educators, insurance providers, etc. At least one (1) member of each Exam Review Committee shall be a Director of the General Credentialing Board.

3.5 Appointment & Term.

(a) Each member serving on an Exam Review Committee shall be appointed by the General Credentialing Board, with the input and recommendations of any other members of such Exam Review Committee and the Executive Director.

(b) Each member of an Exam Review Committee shall serve for a term of three (3) years. The terms of office shall be staggered such that approximately one-third (1/3) of the members, and at least one (1) of the members, is appointed annually; accordingly, the initial terms of some members shall be less than three (3) years.

(c) ERC members may serve a maximum of two (2) consecutive three-year terms. Following two consecutive terms, a member must remain off the committee for at least one full term (3 years) before being eligible for reappointment. This rotation ensures fresh perspectives and prevents undue influence while maintaining institutional knowledge.

3.6 Resignation, Removal & Vacancies.

(a) Any member of an Exam Review Committee may resign at any time by giving written notice of such resignation to the remaining members of the Exam Review Committee, the General Credentialing Board, and the Executive Director.

(b) A majority of the disinterested members of an Exam Review Committee may remove a member at any time, with or without cause, provided that written notice of such proposed action be given to all members at least ten (10) calendar days prior to the meeting at which such removal is to be considered.

(c) If any member of an Exam Review Committee fails to attend any three (3) consecutive meetings or one-half (1/2) of the meetings of an Exam Review Committee in any consecutive twelve (12) month period, such member may be removed from such Exam Review Committee by the General Credentialing Board.

(d) A majority of the disinterested Directors of the General Credentialing Board may remove a member of any Exam Review Committee at any time with or without cause, with or without notice.

(e) Each member of an Exam Review Committee shall comply with the Conflict of Interest Policy, as the same may be amended from time-to-time, and may be subject to removal for a violation of the Conflict of Interest Policy, as set forth in the Conflict of Interest Policy.

(f) The General Credentialing Board shall appoint a replacement member to fill any vacancy on any Exam Review Committee. Any member so appointed shall serve as a member for the remainder of the unexpired term of office.

(g) No Exam Review Committee member, per the Conflict of Interest & Confidentiality Policy, may be eligible for or sit for the CPT certification related to their Exam Review Committee during their term and up to two (2) years after their term ends.

3.7 Chair. When appointing members to an Exam Review Committee, the General Credentialing Board shall appoint one (1) of the Directors of the General Credentialing Board to serve on the Exam Review Committee as its Chair, who shall serve an indefinite term as Chair at the will of the General Credentialing Board.

(a) The Chair shall give direction and oversee the business and affairs of each Exam Review Committee and shall perform such other duties as may be prescribed from time-to-time by the General Credentialing Board or the Executive Director.

(b) The Chair shall preside over all meetings of an Exam Review Committee. In the absence of the Chair at any meeting, the other members of an Exam Review Committee shall appoint an interim Chair for purposes of that meeting.

Statement of Impartiality

The National Healthcare Certification Organization (NHCO) is fully committed to conducting all of its certification activities with the highest degree of impartiality, integrity, and fairness. NHCO recognizes that impartiality is essential to ensure public confidence in its certification programs, its governance processes, and the credibility of its credentials.

To protect this principle, NHCO has established and maintains a robust framework that actively identifies, monitors, and manages any risks to impartiality. This includes:

- Ensuring that all decisions related to certification, policy development, disciplinary actions, and appeals are made free from undue influence or bias.
- Requiring all Board members, committee members, volunteers, and staff to disclose actual, potential, or perceived conflicts of interest and recuse themselves from decisions where impartiality could be compromised. See the Recusal Process contained in Policy 34.0 - Conflict of Interest Mitigation Policy.
- Prohibiting commercial, financial, or other pressures that could improperly affect certification decisions or organizational policies.
- Promoting transparency in all policies, procedures, and decision-making processes.
- Maintaining clear boundaries between organizational functions to ensure fairness and impartiality.
- Requiring adherence to a formal Code of Conduct and Conflict of Interest Policy for all individuals involved in NHCO operations.

NHCO regularly reviews and improves its impartiality safeguards as part of its commitment to continuous quality improvement and stakeholder trust. All individuals involved in NHCO's certification processes share responsibility for upholding these standards.

National Healthcare Certification Organization (NHCO) Examination Security Policy

Purpose

The purpose of this policy is to uphold the integrity, fairness, and legal compliance of the National Healthcare Certification Organization (NHCO)’s examination process. This policy outlines candidate expectations, staff obligations, security standards, confidentiality requirements, and disciplinary consequences related to the examination environment.

I. Examination Security Standards

A. Equal Opportunity & Standardization

NHCO ensures that all candidates are provided with a standardized, secure, and equitable testing environment. All examination sessions are conducted under uniform conditions, with continuous audio and video surveillance to ensure integrity.

B. Copyright Protection & Prohibited Conduct

All NHCO examination materials are protected by federal copyright law. It is strictly prohibited to copy, record, reproduce, memorize, photograph, transmit, distribute, disclose, or discuss any portion of the examination content, in whole or in part, in any form, at any time—before, during, or after the examination.

Violations of this policy may result in:

- Immediate invalidation of exam results
- Permanent disqualification from NHCO certification
- Civil liability and/or criminal prosecution under U.S. copyright law

C. Candidate Responsibilities and Conduct

- All candidates must apply for examination approval via NHCO’s online system.
- Candidates are approved upon verification of all required educational or experiential prerequisites.

D. Pre-Examination Requirements

- Upon approval, candidates will receive instructions to self-register for the examination.

- Candidates must complete a technology onboarding process to confirm compatibility with remote proctoring software.

E. Identification & Dress Code

- Candidates must present a valid, unexpired, government-issued photo ID (e.g., driver's license or passport). Student IDs are not accepted.
- Candidates should dress comfortably but professionally. No sunglasses, hats, hoods, or head coverings (unless for religious or medical purposes with prior approval) are permitted.

F. Proctored Environment Expectations

- Candidates must remain in the test area for the full duration of the examination. Leaving the room may result in automatic disqualification.
- The exam is timed and will auto-submit at the conclusion of the two-hour session.
- Candidates are monitored via live proctoring. Behavior inconsistent with security protocols will be flagged for review.
- Candidates must complete the exam independently. Any form of cheating, including the use of unauthorized materials or communication with others, is grounds for disqualification.
Proctors may not assist with interpretation, clarification, or explanation of exam content.

G. Review of Exam Attempts

- NHCO staff will review flagged sessions and determine whether a policy violation has occurred.
- Candidates may be contacted for clarification. Any claim of technical disruption must be supported by verifiable documentation and will be reviewed on a case-by-case basis.

H. Scoring & Results Notification

- Results are processed only after a review of proctoring data confirms exam integrity.
- Candidates will receive official notice of exam results via email:
 - Pass:** Digital certificate issued
 - Fail:** Re-test instructions provided

- iii. **Void due to violation:** Action taken per the NHCO Disciplinary Policy

II. Staff, Volunteer, and Contractor Security & Confidentiality

1. Commitment to Impartiality

NHCO affirms its commitment to fairness, equity, and impartiality. All certification-related decisions will be made based solely on objective, relevant criteria. Discrimination based on race, sex, religion, national origin, disability, marital status, or any other protected characteristic is prohibited. Please see Policy 1.0 - ADA Accommodations, Non-Discrimination Policy, and Statement of Impartiality Policy.

2. Conflict of Interest Disclosures

Board members, committee members, subject matter experts (SMEs), and internal staff are required to disclose all real or perceived conflicts of interest. They must recuse themselves from decision-making where such conflicts exist. The Executive Director will determine whether recusal or additional safeguards are necessary. Please see Policy 8.0 - Conflict of Interest and Confidentiality Policy, Policy 34.0 - Mitigation of Conflict and Recusal Policy, and the Conflict of Interest Disclosure Form.

3. Confidentiality Obligations

All NHCO employees, volunteers, SMEs, contractors, proctors, and vendors who have access to sensitive information must sign a legally binding Confidentiality Agreement. This agreement covers:

- Examination content and item development
- Candidate records and personal data
- Internal policies, strategy, and proprietary business information

4. Breach of this agreement constitutes a material violation and may result in:

- Immediate termination of contract or employment
- Civil injunction, financial restitution, or other legal remedies
- Potential criminal charges under applicable state and federal law

5. Definition of Confidentiality Breach

A breach includes any unauthorized communication, dissemination, access, or use of NHCO-protected information not expressly authorized in writing. All information acquired through one's role in certification operations is considered confidential unless stated otherwise.

III. Authorized Access & Information Handling

The following parties are bound by NHCO's Confidentiality Agreement and must not disclose confidential information without prior written authorization:

- NHCO General Credentialing Board members
- Exam Review Committee members
- Item Writing (SME) Committee members
- NHCO staff and contractors
- NHCO testing partners and proctoring vendors

Any violation of this policy will be met with immediate and appropriate disciplinary action as outlined in NHCO's Disciplinary Policy.

IV. Enforcement

NHCO reserves the right to take all necessary steps to enforce this policy. This includes:

- Withholding or invalidating examination scores
- Refusal to issue or renew certification
- Reporting misconduct to licensing boards, employers, or law enforcement, where applicable
- Initiating legal action to protect the integrity of its examination system

National Healthcare Certification Organization (NHCO) Internal Audit Policy

This policy aims to ensure that the National Healthcare Certification Organization (NHCO) has a process to conduct internal audits of all Policies and Procedures. The National Healthcare Certification Organization (NHCO) will conduct an internal audit on an annual basis. The person designated to complete the internal audit for the applicable Policies and Procedures must be a National Healthcare Certification Organization (NHCO) General Credentialing Board Member, Administrative Staff, or contractor with applicable knowledge and responsibilities relevant to the policies being reviewed.

Process for the Internal Audit

1. The National Healthcare Certification Organization (NHCO) will designate a person to conduct the audit.
2. The title of the internal audit will be dated and labeled “Internal Audit.”
3. The person will pick three (3) policies “at random” to audit.
4. The following elements will be part of the internal audit:
 - a. Name of the policy
 - b. Explanation of the policy
 - c. Awareness of the policy
 - d. Were there any complaints (learner or employee) about the policy?
 - i. If so, what happened?
 - ii. What was the resolution?
 - e. Is the policy made available to everyone?
 - i. Made available in the Employee Handbook, in the Candidate Handbook, online, and in Policies and Procedures documents
 - f. Are there deficiencies (e.g., not in the handbook(s), complaints not handled properly, etc.)? If so, what are they?
 - g. Make a suggestion to fix the deficiency

Follow-up after the Internal Audit

1. After each audit has been completed, the auditor will provide the National Healthcare Certification Organization (NHCO) General Credentialing Board with a written report of the findings.

2. The National Healthcare Certification Organization (NHCO) General Credentialing Board will investigate any reported deficiencies and recommend changes directly to the Executive Director.
3. The National Healthcare Certification Organization (NHCO) General Credentialing Board will review the deficiencies and recommended changes and either approve the recommended changes or provide alternative changes to address the deficiencies.
4. The Executive Director will implement changes and provide a report on when and how they were implemented.

National Healthcare Certification Organization (NHCOC) Quality Management Review Policy

This policy aims to ensure that the National Healthcare Certification Organization's (NHCOC) quality management (QM) system remains suitable, adequate, and effective. The QM Review will assess opportunities for improvement and elements for change.

1. Schedule of Management Review

- The Quality Management Review will occur annually

2. Elements of the Quality Management Review

- Results of internal audits
- Candidate scoring efficiency and reliability
- Quality management system performance and trends
- Opportunities for continual improvement
- Monitoring of quality objectives
- Results of regular reporting
- Evaluation of the cost of poor quality

3. Review Inputs

- The Quality Management Review process will focus on the following elements:
 - Audit results
 - Certification conformity
 - Improvement opportunities
 - Customer feedback, both positive and negative
 - Process performance and certification conformity
 - Status of corrective actions and preventive actions
 - Changes that might affect the system (e.g., changes to standards, legislation, technology, etc.)
 - Suitability of previous review outcomes and actions

4. Review Outputs

- The Quality Management Review process will generate the following outputs:
 - Process improvement actions
 - Management system improvement actions
 - Product improvement actions
 - Resource provision actions
 - Management meeting minutes
 - Management review meeting records must be retained as quality records in accordance with the Document Retention Policy

National Healthcare Certification Organization (NHCO) Release of Confidential Information Policy

The National Healthcare Certification Organization (NHCO) is responsible for keeping certificants' information confidential and private.

Confidential information is protected by federal, state, and local laws or regulations. To protect the privacy of all NHCO candidates, the NHCO's database of personal information is accessible only to authorized staff and personnel. All confidential information will not be disclosed without expressed written consent from the individual candidate unless required by law or court order.

- Information that is not considered confidential can be shared with schools or employers.
 - Examples of information that is not confidential include certification status, certification number, and status of credentials.
- The National Healthcare Certification Organization (NHCO) allows individuals to verify the credentials of certified candidates through the online certificate verification tool on the NHCO's website.

The National Healthcare Certification Organization (NHCO) has a responsibility to make available the names and certification numbers of individuals who become certified by successfully passing any of the certification examinations offered through the NHCO, and to verify the current status of each certificant. This verification is done by a third party, such as an employer, background check service, or other third-party information verification service. This will include the current status of the certificant, which will be one of three (3) statuses listed below:

- Active and in good standing with no disciplinary action
- Expired (with date)
- Suspended based on disciplinary action

Third-Party Procedures for Certificate Verification

Upon written request, either by mail or email, the National Healthcare Certification Organization (NHCO) shall provide the certification number, certification date, and next certification expiration date for certified individuals. The National Healthcare Certification Organization (NHCO) will also provide this information via the certification verification portal on the National Healthcare Certification Organization (NHCO) website. Since certification is a

voluntary process, the National Healthcare Certification Organization (NHCO) can provide information on individuals whose certification has expired when utilizing the certification verification portal on the National Healthcare Certification Organization (NHCO) website.

Every effort will be made to ensure that certification information is provided for the correct individual. This will be accomplished by requesting the following identifying information:

- First and last name
- Email address
- Certification number, if known
- Year tested

This data will only be released WITH proof that the requesting party has been granted permission by the certificant to access the information. This can be a job application, a signed consent form for a background check, or a consent for personal information.

Certificants Requesting Their Own Information

Certificants can contact the National Healthcare Certification Organization (NHCO) staff with specific information. Once their identity has been established, staff will provide them with the requested information.

National Healthcare Certification Organization (NHCOC) Continuing Education Policy

The National Healthcare Certification Organization (NHCOC) requires that all certificants engage in continuous personal and professional development. To uphold the highest standards of professionalism, the NHCOC requires certificants to periodically renew their certification. This process demonstrates their dedication to mastering their skills and their ability to perform at the highest level of excellence in clinical settings.

Continuing education (CE) must be submitted through the candidate's online profile. All submitted continuing education or work experience documentation is subject to audit.

Active Certificates:

For certifications that are active, the requirements for renewal are as follows:

- 20 hours of continuing education

Continuing education must be completed with an approved site. Examples of approved sites can be found at NHCOCcert.com.

- Certificants may use continuing education from their employer(s). The NHCOC will notify the certificant of approval via email.

Expired Certificates:

For certifications that have been expired for one day and up to two years, the requirements for reinstatement are as follows:

- 30 hours of continuing education

For certifications that have been expired for more than two years but less than four years, the requirements for reinstatement are as follows:

- 40 hours of continuing education

If certification has been expired for more than four years, candidates must meet eligibility requirements and retake the certification examination.

National Healthcare Certification Organization (NHCOC) Renewal Policy

The National Healthcare Certification Organization (NHCOC) requires that all certificants engage in continuous personal and professional development. To uphold the highest standards of professionalism, the NHCOC requires certificants to renew their certification every two years.

To continue using their certification without interruption, certificants must renew before their certification expires.

- Certificates expire two (2) years from the certification date or last renewal date, as noted on the certificate.
- Certificants can renew their certification up to six (6) months prior to expiration.

Eligibility

All individuals seeking to renew their certificate with the National Healthcare Certification Organization (NHCOC) must meet specific eligibility requirements:

- Certificants with an active certification must complete twenty (20) hours of continuing education (CE) through an approved provider, in accordance with Policy 32.0 – Continuing Education Policy.
- Certificants with a certification that has been expired for one (1) day up to two (2) years must complete thirty (30) hours of continuing education (CE).
- Certificants with a certification that has been expired for more than two (2) years but less than four (4) years must complete forty (40) hours of continuing education (CE).

Fees

The renewal fee is \$100 per renewal period of two (2) calendar years. If a certification has been expired for more than one renewal period, the renewal fee will be applied for each missed two-year renewal period (e.g., two renewal fees if expired for more than two years). Certificants who renew their certification after their expiration date has passed must pay a \$25 reinstatement fee in addition to the renewal fee.

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Expired Certificate

If an individual's certificate has been expired for four (4) or more years, it will become invalid and will not be renewed. Exceptions may be extended for special circumstances, such as active military duty, via the appeals process.

National Healthcare Certification Organization (NHCO) Conflict of Interest Mitigation Policy

Purpose

The National Healthcare Certification Organization (NHCO) is committed to maintaining the highest ethical standards by ensuring that decisions are made with impartiality and without personal gain. This policy outlines the procedures the NHCO will follow to identify, disclose, assess, and mitigate conflicts of interest (COIs) to protect the integrity of its operations.

Definition of Conflict of Interest

A conflict of interest occurs when personnel have a relationship or financial interest that could improperly influence—or appear to influence—the NHCO’s business decisions. Examples include, but are not limited to:

- Direct financial interests in NHCO-related transactions.
- Personal or familial relationships with individuals or organizations affected by the NHCO’s decisions.
- Employment or board positions with entities that may benefit from the NHCO’s decisions.
- Any situation that could compromise impartiality or create the perception of bias.

Disclosure of Conflicts of Interest

- **Annual Disclosure**

All personnel must complete a Conflict of Interest and Confidentiality Agreement annually, affirming their understanding of this policy.

- **Ongoing Disclosure**

Individuals must disclose any conflicts of interest immediately upon becoming aware of them by submitting the NHCO's Conflict of Interest Disclosure Form to the Executive Director. The Executive Director will review the disclosure, implement appropriate mitigation measures, and escalate to the General Credentialing Board if the conflict is material or ongoing.

Process for Addressing Conflicts of Interest

- **Initial Review**

Upon receiving a disclosure or becoming aware of a potential conflict, the Executive Director will immediately contact the General Credentialing Board. Formal resolution documentation regarding the disclosure will be completed, and any necessary actions will be outlined within 10 business days. The individual(s) involved may be asked to provide additional details.

- **Determination of Conflict**

The General Credentialing Board will assess the disclosed relationship using the following criteria:

- **Direct Financial Interest** – Does the individual have a personal financial stake in NHCO-related transactions?
- **Personal Gain** – Would the NHCO's decisions benefit the individual or their immediate family?
- **Impairment of Judgment** – Could the relationship interfere with the individual's impartiality?

Resolution & Mitigation Measures

If a conflict is confirmed, the NHCO may take one or more of the following steps:

- **Recusal from Decision-Making** – The individual will not participate in discussions or votes related to the matter. (See section for Recusal Procedures.)
- **Reassignment of Duties** – If the conflict affects job responsibilities, the NHCO may reassign the individual's tasks.
- **Termination of Relationship** – If the conflict is significant and unavoidable, the NHCO may require the individual to end the conflicting relationship or, in extreme cases, step down from their role with the NHCO.
- **Implementation of Safeguards** – The NHCO may implement additional oversight or transparency measures to ensure decisions remain unbiased.

Documentation & Recordkeeping

All conflict-of-interest disclosures, determinations, and resolutions will be documented and retained in the NHCO's records for compliance and review purposes.

Recusal Procedures

- **Grounds for Recusal**

A voting member shall recuse themselves from discussion, deliberation, and voting on any matter in which they have a real or perceived conflict of interest. Grounds for recusal include, but are not limited to:

- **Financial Interest** – The member or an immediate family member has a direct or indirect financial stake in the matter.
- **Professional Affiliation** – The member is employed by, serves on the board of, or has a formal relationship with an entity affected by the decision.
- **Personal Relationship** – The member has a close personal or familial relationship with an individual or organization involved in the decision.
- **Bias or Prejudice** – The member has expressed opinions, publicly or privately, that indicate a lack of impartiality.
- **Legal or Ethical Obligation** – The member’s participation would violate any legal or ethical standards.

Recusal Process

- **Voluntary Recusal**

If a member identifies a conflict of interest, they must:

1. **Declare the conflict** before any discussion takes place.
2. **State their intention to recuse** from participation.
3. **Abstain from discussion and voting** on the matter.
4. **Exit the meeting room** (physically or virtually) during deliberation and voting to avoid influencing the outcome.

- **Requested Recusal**

If another voting member believes a colleague has a conflict of interest, they may formally request recusal by:

1. **Raising the concern** before the discussion begins.
2. **Providing reasoning** for why the member should be recused.
3. **Allowing the concerned member to respond** and clarify their position.

- **Determination by Vote**

If there is a dispute over whether a member should be recused, the remaining voting members shall:

1. **Hold a discussion** without the involvement of the potentially conflicted member.
2. **Conduct a vote** (Requires a majority decision.)
3. **Record the decision** in the meeting minutes.

If the vote determines that the member should be recused, they must comply with the decision.

Documentation & Compliance

- All recusal decisions, voluntary or requested, shall be documented in the official meeting minutes, including the nature of the conflict and actions taken.
- Failure to follow the recusal policy may result in corrective action, including removal from the voting body.
- The NHCO's General Credentialing Board reserves the right to review any potential violations and take appropriate action to maintain the organization's integrity.

Exceptions

In rare cases where full recusal would impede quorum or create an operational challenge, the NHCO leadership may determine an alternative course of action, ensuring transparency and fairness.

Enforcement & Consequences

Failure to disclose a conflict of interest may result in disciplinary action, including potential termination of employment, volunteer status, or service to the NHCO. If an undisclosed conflict is discovered, the NHCO reserves the right to assess and revise decisions influenced by the conflict retroactively.

Appeals Process

Individuals may appeal conflict-of-interest determinations by submitting a written request to the General Credentialing Board, which will conduct a final review.

Examination Eligibility Restrictions

Personnel with access to confidential examination materials, including board members, committee members, subject matter experts, employees, contractors, vendors, and vendor personnel, are prohibited from sitting for the NHCO Certified Phlebotomy Technician (CPT) examination during their service to NHCO and for two (2) years following the end of their service.

This restriction ensures the integrity of the certification process by preventing individuals with insider knowledge from obtaining an unfair advantage.

Personnel who hold current NHCO CPT certification at the time of appointment may maintain certification through standard renewal, but may not sit for the examination during service and for two (2) years following.

For complete terms and conditions, see:

- Conflict of Interest and Confidentiality Agreement v2.0
- Policy 8.0 – Conflict of Interest and Confidentiality Policy

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National Healthcare Certification Organization (NHCOC) Exam Review Committee (ERC) Term Limits Policy

Purpose

The National Healthcare Certification Organization (NHCOC) establishes term limits for Exam Review Committee (ERC) members to ensure fresh perspectives, prevent undue influence, and maintain institutional knowledge while promoting continuous improvement in the certification examination process.

This policy formalizes the term limits structure for all ERC members, balancing the benefits of experienced committee members with the need for regular rotation and diverse viewpoints.

Policy Statement

ERC members may serve a maximum of two (2) consecutive three-year terms. Following two consecutive terms, a member must remain off the committee for at least one full term (3 years) before being eligible for reappointment.

This rotation ensures that the committee benefits from both continuity and renewal, preventing potential conflicts of interest that could arise from extended tenure while preserving valuable expertise within the organization.

Rationale

Term limits serve multiple critical functions for certification integrity:

1. **Fresh Perspectives:** Regular rotation introduces new viewpoints, current industry practices, and innovative approaches to examination development and review.
2. **Conflict of Interest Prevention:** Extended tenure increases the risk of undue influence, familiarity bias, and potential conflicts that could compromise examination integrity.
3. **Knowledge Distribution:** Limiting consecutive terms ensures that examination expertise is distributed across a broader pool of qualified professionals rather than concentrated in a small group.
4. **Industry Best Practice:** Term limits align with standards established by the National Commission for Certifying Agencies (NCCA) and other accreditation bodies, demonstrating commitment to governance excellence.
5. **Stakeholder Confidence:** Transparent rotation policies enhance public trust in the fairness and impartiality of the certification process.

6. Institutional Knowledge Preservation: The two-term maximum allows sufficient time for members to contribute meaningfully, while the mandatory break ensures knowledge transfer and documentation.

Detailed Provisions

Term Length

- Each ERC member serves a three-year term as specified in the NHCO Bylaws and Policy 27.0 – Examination Review Committee Appointment and Term Policy.

Consecutive Term Limit

- No member may serve more than two (2) consecutive three-year terms on the same ERC.

Mandatory Break Period

- Following completion of two consecutive terms (six years total), a member must remain off the committee for at least one full term (3 years) before being eligible for reappointment to the same ERC.

Partial Terms

- If a member is appointed to fill a vacancy and serves less than 18 months of an unexpired term, that period shall not count toward the two-term limit. Service of 18 months or more of an unexpired term shall count as one full term.

Service on Multiple ERCs

- If NHCO establishes multiple ERCs for different certification programs, term limits apply separately to each committee. A member who has served two consecutive terms on one ERC may be appointed to a different ERC without a mandatory break period, though standard appointment criteria and conflict of interest policies apply.

Reappointment Eligibility

- After completing the mandatory three-year break, former members may be reappointed to the ERC following standard appointment procedures and subject to General Credentialing Board approval. Prior service does not guarantee reappointment.

Staggered Terms

- To ensure continuity, terms are staggered such that approximately one-third of ERC members complete their terms each year. This prevents simultaneous turnover of the entire committee.

Transition Period

- Current ERC members serving at the time this policy takes effect will have their consecutive term count begin from their current appointment date. Members currently serving beyond two consecutive terms may complete their current term but are not eligible for immediate reappointment.

Exceptions

The General Credentialing Board may approve exceptions to this policy only under extraordinary circumstances, such as:

- Loss of quorum due to multiple simultaneous resignations or removals
- Specialized expertise critical to an ongoing examination development project with no qualified alternative available
- Transition period for newly established certification programs

Any exception must be:

- Approved by two-thirds (2/3) vote of the General Credentialing Board
- Documented in writing with detailed justification
- Limited in duration (maximum one additional year)
- Disclosed in the annual report to stakeholders

Exceptions may not be granted to circumvent conflict of interest concerns or to retain members with undisclosed conflicts.

Implementation and Monitoring

Tracking

The NHCO Executive Director shall maintain records of all ERC member appointments, including:

- Initial appointment date
- Current term number (first or second consecutive term)
- Term expiration date
- Eligibility for reappointment

Annual Review

The Executive Director shall provide an annual report to the General Credentialing Board identifying:

- Members completing their second consecutive term (requiring mandatory break)
- Upcoming vacancies requiring recruitment
- Former members eligible for reappointment

Recruitment Planning

- To ensure smooth transitions, recruitment for expiring terms should begin at least six (6) months before term expiration. See ERC Recruitment Procedure for detailed guidance.