

# **International Fire Service Accreditation Congress Delegation of Certification Authority**

## **PURPOSE**

The purpose of this paper is to explain the various types of delegation related to an International Fire Service Accreditation Congress (IFSAC) accredited entity's decision to delegate their certification authority.

## **OVERVIEW**

IFSAC has criteria that allows for delegation of certification authority. The criteria were designed to allow for flexibility. The desire for participation in the IFSAC accreditation process has grown over the years. Therefore, it has become necessary to further define and outline IFSAC's view of delegation and how it should be applied to delegated entities. The types of delegation described in this document should be used as the basis for discussion on developing IFSAC's concept of delegation.

The *Criteria for Certificate Accreditation*, Certification Program Administration, para.11 & 12 address delegation of certification authority. However, within these paragraphs there are actually three types of delegation addressed. For this paper, we will call them Type I, Type II, and Type III delegation. Type IV delegation comes as the result of by-law article 12.3.10.

- Type I addresses paragraph 11A, B, C, and the first part of D.
- Type II addresses the last part of 11D.
- Type III addresses paragraph 12.
- Type IV addresses the results of Article 12.3.10

To understand delegation, we must first understand IFSAC membership, IFSAC accreditation, and the definition of delegation as it applies to the IFSAC criteria. Although membership in IFSAC is a requirement to becoming accredited, membership and accreditation are separate issues.

The areas addressed in this document include:

- IFSAC membership
- IFSAC accreditation
- Type I delegation
- Type II delegation
- Type III delegation
- Type IV accreditation/delegation
- Table outlining delegation

**NOTE: The table at the end of this document shows the various types of delegation outlined in this document.**

## **IFSAC MEMBERSHIP**

IFSAC by-law article 11.4.2 outlines IFSAC's policy of having only one voting representative from any particular state, province, etc. The preferred IFSAC member is the highest empowered certifying entity within the jurisdiction (i.e., state/provincial training agency, fire marshals office, etc.).

### ***Bylaw Article 11.4.2***

*11.4.2 It is the intent of the Certificate Assembly that only one voting entity shall represent any state, provincial, territorial, or federal government agency to ensure representation in the Assembly remains balanced and uniform.*

Realistically, the highest empowered jurisdictional entity may not, for whatever reason, want to participate in IFSAC. IFSAC by-law article 12.3.10 and sub-articles address this situation.

Essentially, article 12.3.10 applies as follows. "State/Province XYZ" does not want to participate, IFSAC will accept membership from one or more qualified, lesser-empowered organizations that wish to become accredited and offer IFSAC accredited certifications. However, since each state/province can have only one vote, all IFSAC member organizations from that state/province must designate one individual to carry the vote or they must all be non-voting members.

### ***By-law Article 12.3.10***

*12.3.10 In states, provinces, territories, and federal jurisdictions where no interest is shown to participate in the Certificate Assembly by those entities, local jurisdictions may apply. It is clearly understood that at such time as the state, province, territory, or federal government agency does make application and is accredited and providing certification services, the local jurisdiction will no longer be recognized as a voting member of the Certificate Assembly and shall no longer have accredited authority to issue certificates unless such authority is delegated to it by the superseding entity.*

*12.3.10.1 In those cases described in 12.3.10 where more than one local jurisdiction (college, etc.) applies for membership, it is the intent of the Certificate Assembly that only one voting representative shall represent the state, province, or territory.*

*12.3.10.2 Representation on the Assembly can be determined in one of the following ways:*

*12.3.10.2.1 All entities within the jurisdiction wishing a vote must form a coalition and select one individual from the coalition to represent all entities with the coalition.*

*12.3.10.2.2 All entities within the state, province, or territory will be admitted into the Assembly as non-voting members in accordance with 11.4.2 (b).*

### ***IFSAC Member Entitlements***

1. Eligible for accreditation (if applicable)
2. Entity listed as an IFSAC member on the IFSAC website, Handbook CD, and tradeshow booth.
3. Entity has all rights and privileges of other voting/non-voting (as applicable) members.

## **IFSAC ACCREDITATION**

To become an accredited IFSAC member, the certifying entity is required to fulfill all requirements of the *Criteria for Certificate Accreditation*, and undergo a site visit.

*Accredited entities are entitled to*

1. Listing as an IFSAC accredited entity on the website, Handbook CD, and tradeshow booth.
2. Entity may issue the IFSAC seal on certification certificates.
3. Entity may become accredited to any additional NFPA certification levels they so choose.
4. Entity may use the IFSAC logo on advertising literature, brochures, and catalogs.
5. Entity may claim IFSAC accreditation on advertising literature, brochures, and catalogs.

Again, realizing that not all highest empowered jurisdictional entities will want to become accredited, IFSAC will allow one or more qualified lesser-empowered organizations to become accredited. The reason IFSAC does this is because we do not want one community college (or other agency of equal empowerment) to dominate the certification efforts within a state leading to a potential restriction of trade issue.

The caveat to this as stated in 12.3.10 is that if and when the highest empowered jurisdictional entity becomes a member of IFSAC and subsequently becomes accredited, all lesser-empowered organizations will have to cease certifying to those levels that the state attains unless authorized (through Type IV delegation) by the state.

## **DELEGATION OF CERTIFICATION AUTHORITY**

Jurisdictional-specific reasons may warrant IFSAC accredited entities to delegate their certifying authority to other agencies within their jurisdiction (Types I – II). They may also wish to delegate authority to an accredited entity from outside their jurisdiction to conduct certification inside their jurisdiction (Type III). The final type of delegation (Type IV) comes as the result of a previously accredited entity losing accreditation for certain levels due to a higher empowered entity receiving accreditation for those levels. Type IV delegates have a combination of issues related to both accredited and delegated entities.

### ***Definition of Delegation***

The definition of delegation, as used in this document, means that the primary IFSAC accredited entity entrusts its certification authority to another organization to represent the accredited entity in its certification processes.

Whichever type of delegation (Type I-IV) is chosen, and based on the definition of delegation above, the highest empowered accredited entity retains overall decision-making authority ~~and ability~~ on matters of certification and accreditation within their jurisdiction.

### *Applicable Criteria for Certificate Accreditation*

11. An accredited entity may delegate any or all of its certifying authority for accredited levels only after informing IFSAC Administration and under the following circumstances:

- A. The delegated certification authority shall be conducted under the same procedures, criteria, and standards as those used by the accredited entity. (For variations see (D)).
- B. The accredited entity delegating its authority shall be responsible for compliance with accreditation criteria.
- C. An accredited entity shall not delegate its certifying authority to another entity that has a broader geographical service area in terms of constituency.
- D. All materials for delegated levels shall be made available for site team review to ensure compliance with the accreditation criteria, or if the delegated entity uses a different set of criteria from the accredited entity, the accredited entity shall ensure a separate application [for accreditation] is submitted to IFSAC. A separate site visit, along with appropriate fees, may be necessary as determined by Administration (in concurrence with the Board Chair and the chair of the Committee on Site Teams).

**BASIS FOR JUDGMENT:** Published and publicly available policy addressing this criterion. If any delegation is to occur, full details shall be submitted during the application and self-study process. Include recipients of delegation and manner in which compliance with accreditation criteria will be controlled by your entity.

12. An entity may delegate any or all of its certification authority for non-accredited levels to another accredited entity with the approval of Administration, in concurrence with the Chair of the Certificate Assembly Board of Governors, and the Chair of the Committee on Site Teams.

- A. Administration must ensure that the empowered entity has approved the delegation, and that the accredited entity receiving the delegation has sufficient resources and can continue to follow their accredited Certificate Assembly procedures in the new geographical area(s).
- B. Certificates and seals will be issued under the delegated authority's name.

**BASIS FOR JUDGMENT:** Published and publicly available policy addressing this criterion. For example, Entity A requests Entity B to enter Entity A's jurisdiction to certify individuals for a level that Entity A is not accredited. Certificates will be issued under the delegated authority's name. If Entity A later gains accreditation for that level, reciprocity may be granted. Delegation occurs whether the testing is a one-time or a multiple event.

## ***Type I Delegation***

Under Type I delegation, the delegated entity is used strictly as a remote testing site for the accredited entity and is not authorized to claim association or accreditation through IFSAC.

### **Cost to delegated entity**

1. Delegated entity has no yearly recurring membership fee - Accredited entity is the member.
2. Accreditation fee – The Accredited entity is responsible for paying all site visit fees.

### **Responsibilities**

1. The delegated entity is permitted to carry out the written and skills testing under the auspices of the accredited entity.
2. The accredited entity is responsible for making sure the delegated entity complies with their policies and procedures and the IFSAC *Criteria for Certificate Accreditation*.
3. The delegated entity is required to fulfill all requirements of the *Criteria for Certificate Accreditation* and undergo a site visit as part of the accredited entity's site visit.

### **Entitlements**

1. **NOT** listed as a *member* of IFSAC on the IFSAC website, Handbook CD, or tradeshow booth advertising.
2. **NOT** listed as an IFSAC *accredited entity* on the IFSAC website, Handbook CD, or tradeshow booth advertising.
3. May **NOT** issue the IFSAC seal on the delegated entity's certification certificate. They would be issued on the accredited entity's certification certificate.
4. May **NOT** become accredited to any additional levels. This would have to be worked through the accredited entity.
5. May **NOT** use the IFSAC logo on advertising literature, brochures, or catalogs.
6. May **NOT** claim IFSAC accreditation on advertising literature, brochures, or catalogs.
7. Has **NO** rights/privileges of voting/non-voting (as applicable) members.

## ***Type II Delegation***

Type II delegation results from the shaded portion of paragraph 11D of the *Criteria* shown below.

D. All materials . . . . ., ***or if the delegated entity uses a different set of criteria from the accredited entity, the accredited entity shall ensure a separate application*** [for accreditation] ***is submitted to IFSAC. A separate site visit, along with appropriate fees, may be necessary as determined by Administration (in concurrence with the Board Chair and the chair of the Committee on Site Teams).***

In Type II delegation, the delegated entity is ***not*** an accredited entity. They act as a representative of the accredited entity. The difference between Type I and II is that there may be circumstances where the delegated entity must use different policies and procedures other than those of the accredited entity. An example of this would be:

- a. The accredited entity wishes to offer airport firefighter level certifications; however, they do not have the skills testing capabilities, facilities, staff, etc., to certify to Airport Firefighter.
- b. An airport training facility within their jurisdiction has all the required resources that the accredited entity and NFPA standards require to conduct certification at this level.
- c. Due to state, federal, or other governing regulations, the airport's operating policies and/or procedures are different than those of the accredited entity.

In this case the accredited entity may authorize Type II delegation to the airport facility.

## **Cost**

1. Delegated entity has no yearly recurring membership fee - Accredited entity is the member.
2. Accreditation fee – Responsibility for the payment of application and site visit fees for the delegated entity site visit is agreed upon by the accredited entity and the delegated entity and paid to Administration prior to the visit.

## **Responsibilities**

1. As a Type II delegated authority of an accredited entity, the delegated entity is responsible for preparing for and undergoing a site visit in the same manner as the accredited entity.
2. The accredited entity is responsible to make sure the delegated entity complies with the IFSAC *Criteria for Certificate Accreditation*.
3. The delegated entity site visit may or may not take place at the same time as the accredited entity site visit.

## **Entitlements**

1. **NOT** listed as a ***member*** of IFSAC on the IFSAC website, Handbook CD, or tradeshow booth advertising.

2. **NOT** listed as an IFSAC *accredited entity* on the IFSAC website, Handbook CD, or tradeshow booth advertising.
3. May **NOT** issue the IFSAC seal on the delegated entity's certification certificate. They would be issued on the accredited entity's certification certificate.
4. May **NOT** become accredited to any additional levels they so choose. This would have to be worked through the accredited entity.
5. May **NOT** use the IFSAC logo on advertising literature, brochures, or catalogs.
6. May **NOT** claim IFSAC accreditation on advertising literature, brochures, or catalogs.
7. Has **NO** rights/privileges of voting/non-voting (as applicable) members.

### ***Type III Delegation***

Type III delegation comes as a result of *Criteria* paragraph 12.

***12. An [accredited] entity may delegate any or all of its certification authority for non-accredited levels to another accredited entity with the approval of Administration, in concurrence with the Chair of the Certificate Assembly Board of Governors, and the Chair of the Committee on Site Teams.***

This delegation was put into place to cover those entities that may have so few candidates needing a specific level of certification that it does not warrant the costs and resources to become accredited to those levels, but yet they do not want their firefighters to have to travel out-of-state to receive the certification.

Example:

- a. Entity A is not accredited to Fire Investigator.
- b. Entity B is accredited to this level and is invited by Entity A to conduct the certification testing within Entity A's jurisdiction.
- c. An agreement is reached and documented through IFSAC Administration.
- d. Administration must ensure that the empowered entity has approved the delegation and that the accredited entity receiving the delegation has sufficient resources and can continue to follow their accredited Certificate Assembly procedures in the new geographical area(s).
- e. Certificates and seals will be issued under the delegated authority's (Entity B) name.
- f. If at some point in the future Entity A is awarded accreditation for that level, reciprocity may be granted.
- g. Delegation occurs whether the testing is a one-time or multiple event.

## ***Type IV Accreditation/Delegation***

Type IV delegation applies to those entities that were previously voting accredited entities and result from the following text of by-law article 12.3.10.

***In states, provinces, territories, and federal jurisdictions where no interest is shown to participate in the Certificate Assembly by those entities, local jurisdictions may apply. It is clearly understood that at such time as the state, province, territory, or federal government agency does make application and is accredited and providing certification services, the local jurisdiction will no longer be recognized as a voting member of the Certificate Assembly and shall no longer have accredited authority to issue certificates unless such authority is delegated to it by the superseding entity.***

The Type IV IFSAC accredited/delegated entity has characteristics and responsibilities of both accredited and delegated entities. This entity is one that has moved to non-voting status but yet maintains accreditation status for those levels not yet accredited to the higher-empowered authority.

### **Costs**

- Costs associated with the **accredited levels** are the same as for any IFSAC accredited entity.
- Costs associated with **delegated levels** are the same as for Type I or II delegated authorities as applicable.

### **Responsibilities**

1. The Type IV accredited/delegated entity may continue using their own policies and procedures for those levels for which they have been accredited.
2. Responsibilities for **accredited levels** are the same as for any accredited entity.
3. Responsibilities for **delegated levels** are the same as for any Type I or II delegated entity.

### **Entitlements**

1. Listing as an IFSAC accredited entity on the website, Handbook CD, and tradeshow booth.
2. Entity may issue the IFSAC seal on certification certificates for **accredited levels only**.
3. Entity must issue the IFSAC seal for **delegated levels** on the higher-empowered accredited entity's certification certificate.
4. Entity may **NOT** become accredited to any additional NFPA certification levels unless authorized by the higher empowered accredited entity.
5. Entity may use the IFSAC logo on advertising literature, brochures, and catalogs.
6. Entity may claim IFSAC accreditation on advertising literature, brochures, and catalogs.



**TABLE OF ACCREDITED AND DELEGATED ENTITY TYPES**

<b>TABLE OF ACCREDITED AND DELEGATED ENTITY TYPES</b>			
<b>Entity</b>	<b>Description</b>	<b>Responsibilities</b>	<b>Entitlements</b>
IFSAC Accredited	Is a member of IFSAC and has undergone an initial site visit.	<ol style="list-style-type: none"> <li>1. Must continue to fulfill all requirements of the <i>Criteria for Certificate Accreditation</i>.</li> <li>2. Must maintain accreditation by undergoing a site visit every 5 years.</li> </ol>	<ol style="list-style-type: none"> <li>1. Listing as an IFSAC accredited entity on the website, Handbook CD, and tradeshow booth.</li> <li>2. Entity may issue the IFSAC seal on certification certificates.</li> <li>3. Entity may become accredited to any additional NFPA certification levels they so choose.</li> <li>4. Entity may use the IFSAC logo on advertising literature, brochures, and catalogs.</li> <li>5. Entity may claim IFSAC accreditation on advertising literature, brochures, and catalogs.</li> </ol>
Type I Delegated	Authorized as a remote testing site for the accredited entity and is not authorized to claim association with or accreditation through IFSAC.	<ol style="list-style-type: none"> <li>1. The delegated authority is permitted to carry out the written and skills testing under the auspices of the accredited entity.</li> <li>2. The accredited entity is responsible for making sure the delegated entity complies with their policies and procedures and the IFSAC <i>Criteria for Certificate Accreditation</i>.</li> <li>3. The delegated entity would be required to fulfill all requirements of the <i>Criteria for Certificate Accreditation</i> and undergo a site visit as part of the accredited entity's site visit.</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>NOT</b> listed as a <b>member</b> of IFSAC on the IFSAC website, Handbook CD, or tradeshow booth advertising.</li> <li>2. <b>NOT</b> listed as an IFSAC <b>accredited</b> entity on the IFSAC website, Handbook CD, or tradeshow booth advertising.</li> <li>3. May <b>NOT</b> issue the IFSAC seal on the delegated entity's certification certificate. They would be issued on the accredited entity's certification certificate.</li> <li>4. May <b>NOT</b> become accredited to any additional levels. This would have to be worked through the accredited entity.</li> <li>5. May <b>NOT</b> use the IFSAC logo on advertising literature, brochures, or catalogs.</li> <li>6. May <b>NOT</b> claim IFSAC accreditation on advertising literature, brochures, or catalogs.</li> <li>7. Has <b>NO</b> rights/privileges of voting/non-voting (as applicable) members.</li> </ol>

Entity	Description	Responsibilities	Entitlements
Type II Delegated	<p>Results from the shaded portion of paragraph 11D of the <i>Criteria</i> shown below.</p> <p>D. All materials ....., <i>or if the delegated entity uses a different set of criteria from the accredited entity, the accredited entity shall ensure a separate application</i> [for accreditation] <i>is submitted to IFSAC. A separate site visit, along with appropriate fees, may be necessary as determined by Administration (in concurrence with the Board Chair and the chair of the Committee on Site Teams).</i></p> <p>The delegated entity is <i>not</i> an accredited entity. They act as a representative of the accredited entity.</p> <p>The difference between Type I and II is that there may be circumstances where the delegated entity must use different policies and procedures than the accredited entity.</p>	<ol style="list-style-type: none"> <li>1. The Type II delegated entity is responsible for preparing for and undergoing a site visit in the same manner as the accredited entity.</li> <li>2. The accredited entity is responsible to make sure the delegated entity complies with the IFSAC <i>Criteria for Certificate Accreditation</i>.</li> <li>3. The delegated entity site visit may or may not take place at the same time as the accredited entity site visit.</li> </ol>	<ol style="list-style-type: none"> <li>1. <b>NOT</b> listed as a <i>member</i> of IFSAC on the IFSAC website, Handbook CD, or tradeshow booth advertising.</li> <li>2. <b>NOT</b> listed as an IFSAC <i>accredited entity</i> on the IFSAC website, Handbook CD, or tradeshow booth advertising.</li> <li>3. May <b>NOT</b> issue the IFSAC seal on the delegated entity's certification certificate. They would be issued on the accredited entity's certification certificate.</li> <li>4. May <b>NOT</b> become accredited to any additional levels they so choose. This would have to be worked through the accredited entity.</li> <li>5. May <b>NOT</b> use the IFSAC logo on advertising literature, brochures, or catalogs.</li> <li>6. May <b>NOT</b> claim IFSAC accreditation on advertising literature, brochures, or catalogs.</li> <li>7. Has <b>NO</b> rights/privileges of voting/non-voting (as applicable) members.</li> </ol>

<b>Entity</b>	<b>Description</b>	<b>Responsibilities</b>	<b>Entitlements</b>
Type III Delegated	Those entities that may have so few candidates needing a specific level of certification that it does not warrant the costs and resources to become accredited to those levels, but yet they do not want their firefighters to have to travel out-of-state to receive the certification.	<p>Example:</p> <ul style="list-style-type: none"> <li>a. Entity A is not accredited to Fire Investigator.</li> <li>b. Entity B is accredited to this level and is invited by Entity A to conduct the certification testing within Entity A's jurisdiction.</li> <li>c. An agreement is reached and documented through IFSAC Administration.</li> <li>d. Administration must ensure that the empowered entity has approved the delegation and that the accredited entity receiving the delegation has sufficient resources and can continue to follow their accredited Certificate Assembly procedures in the new geographical area(s).</li> <li>e. Certificates and seals will be issued under the delegated authority's (Entity B) name.</li> <li>f. If at some point in the future Entity A gains accreditation for that level, reciprocity may be granted.</li> <li>g. Delegation occurs whether one-time or a multiple event.</li> </ul>	Not Applicable in this type of delegation.

Entity	Description	Responsibilities	Entitlements
Type IV Delegated	<p>Applies to entities resulting from the following text of by-law article 12.3.10.</p> <p><i>It is clearly understood that at such time as the state, province, territory, or federal government agency does make application and is accredited and providing certification services, the local jurisdiction will no longer be recognized as a voting member of the Certificate Assembly and shall no longer have accredited authority to issue certificates unless such authority is delegated to it by the superseding entity.</i></p> <p>The Type IV IFSAC accredited/delegated has characteristics and responsibilities of both accredited and delegated entities. This entity is one that maintains accreditation status for those levels not yet accredited to the higher-empowered authority.</p>	<ol style="list-style-type: none"> <li>1. The Type IV accredited/delegated entity may continue using their own policies and procedures for those levels for which they have been accredited.</li> <li>2. Responsibilities for accredited levels are the same as for any accredited entity.</li> <li>3. Responsibilities for delegated levels are the same as for any Type I or II delegated entity.</li> </ol>	<ol style="list-style-type: none"> <li>1. Listing as an IFSAC accredited entity on the website, Handbook CD, and tradeshow booth.</li> <li>2. Entity may issue the IFSAC seal on certification certificates for accredited levels only.</li> <li>3. Entity must issue the IFSAC seal for delegated levels on the higher-empowered accredited entity's certification certificate.</li> <li>4. Entity may <b>NOT</b> become accredited to any additional NFPA certification levels unless authorized by the higher empowered accredited entity.</li> <li>5. Entity may use the IFSAC logo on advertising literature, brochures, and catalogs.</li> <li>6. Entity may claim IFSAC accreditation on advertising literature, brochures, and catalogs.</li> </ol>

