



The North American Board of Breastfeeding and Lactation Medicine Manual for Candidates Grandparenting-In Pilot Exam 2023

Published August 2023

Table of Contents

Overview	3
Certification Overview	4
About the Exam	4
Statement of Non-Discrimination	4
Confidentiality	4
Criteria for Certification	5
Applying for the NABBLM-C Examination	6
Educational Background and Licensure Requirements	6
Knowledge and Experience	6
Required Scope of Practice	6
Documentation needed to complete the NABBLM-C Application	6
For candidates licensed in the USA	6
For candidates licensed in Canada	7
For all candidates	7
The application is considered complete when:	7
Candidate eligibility	7
NABBLM Certification Exam Fee	7
Examination Appointment Policy	7
Deferral	7
Cancellation Policy	8
No Show Policy	8
Preparing for the Certification Examination	8
Taking the Certification Exam	9
Scheduling	9
Live Remote Proctoring	9
Non-disclosure and general terms of use agreement	9
Checklist for preparing for the online exam	10
During the exam	11
Upon finishing the exam	11
After the Examination	12
Candidates who pass the exam	12
Candidates who do not pass the exam	13
Appeals & Testing Concerns	13
NABBLM-C Re-certification	13
Code of Ethical and Professional Conduct	14
Disciplinary Policy	16
Complaints	16
Complaint Review	17
Determination of Violation	18
Sanctions	18
Appeal	19
Resignation	20

Overview

The North American Board of Breastfeeding and Lactation Medicine (NABBLM) is a voluntary, autonomous board that provides direction for the education and skills physicians need to become board certified as Physician Breastfeeding and Lactation Medicine (BFLM) Specialists. NABBLM also administers the exam for Physician Breastfeeding and Lactation Medicine board certification and provides a maintenance of certification program. NABBLM is independent of other Breastfeeding Medicine and Lactation organizations.

NABBLM's Mission:

- Set standards for training that prepares physicians for board certification in Breastfeeding and Lactation Medicine.
- Create a process for certification and maintenance of certification in Breastfeeding and Lactation Medicine.
- Certify physicians who have met the educational, clinical training, and examination requirements to practice Breastfeeding and lactation Medicine.
- Provide and endorse resources for physicians to maintain high professional standards through professional development and lifelong learning in Breastfeeding and Lactation Medicine
- Serve the public by ensuring that all physicians practicing Breastfeeding and Lactation Medicine meet the highest standards of excellence in clinical care.

Educate other professions and the public about the field of Breastfeeding and Lactation Medicine:

1. Maintain a public registry of physicians who are certified by the NABBLM.
2. Create public and professional awareness of the field of Breastfeeding and Lactation Medicine and its importance in promoting, protecting and supporting lactating families in a manner that is inclusive and equitable.
3. Facilitate the integration of Breastfeeding and Lactation Medicine as required education for all physicians-in-training.

Advance the field of Breastfeeding and Lactation Medicine:

- Establish Breastfeeding and Lactation Medicine as a clinical medical specialty in academic centers and other healthcare settings.
- Cultivate leaders in Breastfeeding and Lactation Medicine to expand the specialty's impact on clinical medicine, public health, medical education, human rights, policy, research, and advocacy.

Certification Overview

About the Exam

The first NABBLM certification exam has been created with guidance from a psychometrician. A psychometrician is an individual who practices the science of educational and psychological measurement. The process included a Job Task Analysis Committee (JTA) of subject matter experts (SMEs) who outlined the tasks, knowledge, skills, tools, abilities and characteristics needed to become a Breastfeeding and Lactation Medicine Physician Specialist. The JTA committee's recommendations were validated by a survey among physicians practicing Breastfeeding and Lactation Medicine, which was then used to guide the blueprint for the first NABBLM certification exam. NABBLM recognizes that the tasks, knowledge and skills outlined for this exam may not be relevant for every individual who takes this exam.

NABBLM is responsible for exam applications and approval. NABBLM partners with Assessment Systems, a test development and delivery company responsible for the examination administration, exam security, scoring and statistical analysis of examination content. The exam will be taken remotely in a secure location chosen by the candidate and proctored remotely.

The first NABBLM certification exam will be offered in October 2023 as a pilot, and once in 2024 (anticipated April 2024). The initial exam is only for individuals who meet the application criteria as a licensed and experienced Breastfeeding and Lactation Medicine Physician in the United States or Canada (grandparenting in). The exam will be 150-180 single answer multiple choice questions and must be completed in a 6 hour window of time.

Statement of Non-Discrimination

NABBLM offers examinations to all eligible persons regardless of age, gender, race, religion, national origin, or disability. This statement also applies to the hiring and firing of staff and selection of volunteers and board members.

Confidentiality

NABBLM is committed to protecting confidential and/or proprietary information related to applicants, candidates, and the examination development, maintenance, and administration process.

Confidential information includes but is not limited to an individual's application status, personal applicant/diplomate information, exam development documentation (including job analysis study reports, technical reports, and cut score studies), exam items and answers, exam forms, item banks, and individual exam scores.

NABBLM will not disclose confidential applicant/diplomate information unless authorized in writing by the individual or as required by law. If information is released due to a legal matter, NABBLM will inform the individual.

Personal information submitted by applicants/diplomates with an application or recertification application is considered confidential. Personal information retained within the applicant/diplomate database will be kept confidential.

All application information, including the status of an application, is confidential and will not be shared with any party other than NABBLM's examination development or administration vendors, as needed, for certification processing purposes.

Information about applicants/diplomates and their examination results is considered confidential. Exam results will be released only to the individual candidate unless a signed release is provided. The NABBLM can disclose that a diplomate is certified in responding to an inquiry from an outside party.

Any aggregate examination statistics that are made publicly available, such as aggregate examination statistics, studies and reports concerning applicants/candidates/diplomates will contain no information identifiable with any applicant/candidates/diplomates, unless authorized in writing by the individual.

Criteria for Certification

Physicians who are already practicing Breastfeeding and Lactation Medicine and who are seeking Board Certification in Breastfeeding and Lactation Medicine must meet the eligibility requirements and pass the initial NABBLM certification exam to become board certified. The Certification in Breastfeeding and Lactation Medicine (NABBLM-C) is valid for as long as the physician continues to participate in and successfully complete their maintenance of certification responsibilities, and maintain a current, valid, unrestricted license to practice allopathic or osteopathic medicine in a state or jurisdiction of the United States, or province or territory of Canada. The maintenance of certification activities will begin in 2025 for those who take the pilot exam in October 2023. Board certification is granted for a period of 5 years, with re-certification cycles being 5 years. Please see **NABBLM-C Recertification for more information.**

Applying for the NABBLM-C Examination

To be eligible to take the initial certification exam, you must meet the following requirements:

Educational Background and Licensure Requirements

1. Graduation from an accredited allopathic or osteopathic medical school in the United States or Canada, or possession of Final Certification by the Educational Commission for Foreign Medical Graduates (ECFMG) if graduated from a medical school in a different country.
2. Possession of a current, valid, unrestricted license to practice allopathic or osteopathic medicine in a state or jurisdiction of the United States, or province or territory of Canada.
3. Current or previous board-certification by a medical specialty board recognized by the American Board of Medical Specialties (ABMS) or the American Osteopathic Association (AOA) for physicians practicing in the United States OR current or previous certification by the College of Family Physicians of Canada or the Royal College of Physicians and Surgeons of Canada for physicians practicing in Canada.

Knowledge and Experience

1. Having practiced Breastfeeding and Lactation Medicine independently post-training for at least 3 of the last 4 years at a diagnostic and management level.
2. 45 CME credits directly related to breastfeeding and lactation over the past 3 years will be required to sit for the board exam. Educational credits must be taught at a physician level so only those taught by MD, DO, MBBS, PhD will be accepted.

Required Scope of Practice

1. Knowledge and skills to evaluate and manage both the lactating parent(s) and child(ren) when caring for breastfeeding or lactating patients.
2. Recognition that breastfeeding and lactation medicine involves the care of both the parent(s) and child(ren), such that the individual routinely assesses both during medical decision making.

Documentation needed to complete the NABBLM-C Application

NABBLM reserves the right to verify all information provided by the candidate. We do not require uploading documentation such as proof of board certification or medical licensure at the time of application. NABBLM will conduct random audits of education, licensure, medical certification and CME among new and recertifying applicants. Applicants selected for audit will be required to provide documentation verifying that the eligibility criteria are met. NABBLM will contact selected applicants for audit and provide additional detail on the requirements. Failure to provide necessary documentation within 30 days of request will disqualify the candidate from taking the board examination. Application fees will not be refunded. Applications are due by September 25, 2023.

Candidates will need to have the following information for the application:

For candidates licensed in the USA

1. State license number and expiration date
2. National Provider Identifier Number (NPI)

For candidates licensed in Canada

1. Provincial provider number
2. Date of licensure

For all candidates

1. Information on 45 CME credits in Breastfeeding and Lactation Medicine in the last 3 years. Please have information on the sponsoring organization, the lecturer (if not at a physician conference), date, and number of credits. Educational credits must be taught at a physician level so only those taught by MD, DO, MBBS, PhD will be accepted.

The application is considered complete when:

1. All requested information has been submitted
2. Payment for application fee is submitted.

Candidate eligibility

The candidate's application is reviewed by the credentials committee. If the candidate is deemed eligible to take the exam, the candidate will receive an email that notifies them of their eligibility and a link to pay the exam fees. Once the payment for exam fees is received, the candidate will receive information on the details for taking the exam.

NABBLM will provide reasonable and appropriate testing accommodations in accordance with the Americans with Disabilities Act of 1990, as amended for individuals with documented disabilities who request and demonstrate the need for accommodation as required by law. ADA regulations define a person with a disability as someone with a physical or mental impairment that substantially limits one or more major life activities. NABBLM requires documentation to validate the type and severity of a disability to enable accommodations to be specifically matched with the identified functional limitation, in order to provide equal access to exam functions for all examinees. Applicants should indicate on the application form if an accommodation is requested. Documentation from a licensed healthcare provider is required for submission to document the needed accommodations. NABBLM will contact individuals directly to review the request.

To apply, please visit nabblm.org/ (this application is being built)

NABBLM Certification Exam Fee

The fee for the initial pilot NABBLM certification exam is \$1000.00 in the national currency of either US or Canada where the applicant is licensed to practice. Future exams are expected to cost at least \$1500. The exam fees are due no later than October 15, 2023.

Examination Appointment Policy

Deferral

A deferral is defined as a candidate signing up for and paying for the pilot exam, but requesting to defer until the next available exam. In this case the candidate will be offered the opportunity to take

a subsequent exam within the next year and will be responsible for the difference in cost between the subsequent exam and the amount paid for the pilot exam.

Cancellation Policy

If the candidate chooses to cancel their exam after they have paid the exam fee, a processing fee of \$100 will be withheld from the examination fee. Cancellation may be done up to the final date of the exam. Application fees are nonrefundable.

No Show Policy

If the candidate is not present for the exam without prior notification, the exam fee will not be refunded. The candidate would have the option of applying their exam fee to a subsequent exam within 1 year. Candidates who “no show” will be required to forfeit a \$100 processing fee and are responsible for the cost difference between the pilot exam and the subsequent exam.

Preparing for the Certification Examination

The NABBLM exam blueprint can be used for preparation for the exam. NABBLM encourages exam candidates to study and learn from materials prepared by physicians and other providers. NABBLM’s role is in developing and administering the examination for board certification. NABBLM does not require, provide, accredit, or endorse any specific study guides, training or review courses, or other examination materials.

Please visit our [website](#) for more information on educational resources that are appropriate for exam preparation.

We understand that for the pilot exam in October 2023, there will not be as much time to study as there will be for future exams. For this reason, people who take the pilot exam and do not receive a passing score may opt to retake the exam in 2024 at no additional charge.

Please visit nabblm.org/exam_blueprint for the exam outline.

Taking the Certification Exam

Scheduling

After a candidate's application has been accepted and the exam fee is paid, the candidate will receive information via email on how to access their exam.

The exam will be available October 25th through the 28th, 2023 Pacific Standard Time. Candidates must complete the exam within one 6 hour block of time. Breaks will be permitted between test sections to accommodate personal needs including lactation. NABBBLM anticipates that most candidates will finish the exam within 4-6 hours with two breaks up to 40 minutes in length.

Live Remote Proctoring

The NABBBLM exam will be administered by live remote proctoring. This permits the candidate to test from their home or office in place of a testing center. This is the only option for the NABBBLM exam at this time. The remote proctor protects against academic dishonesty by confirming the test taker's identity and recording the surroundings during the exam through audio and video recording. Please carefully review the guidelines below to determine the best time and place to take the examination.

Non-disclosure and general terms of use agreement

Prior to starting the NABBBLM certification exam, you will be asked to sign the following non-disclosure and general terms of use agreement. Failure to accept this agreement will disqualify the candidate from taking the exam, and the exam fee will be forfeited.

By acknowledging that you have read this agreement, you are indicating that you agree to the terms and conditions set forth below:

- I understand that the contents of this exam are the property of the NABBBLM and are copyrighted under the laws of the United States.*
- I understand that I am expressly prohibited from disclosing, publishing, reproducing, or transmitting this exam, in whole or in part, in any form or by any means, oral or written, electronic or mechanical, for any purpose.*
- I understand that using any prohibited aids in connection with the exam, attempting to give or receive assistance, or otherwise communicate in any form about or during the exam is strictly prohibited.*
- I have read, understand, and agree that my exam may not be scored, the exam fee may be forfeited, and I may be barred from future NABBBLM examinations if NABBBLM has reason to believe that I am involved in exam misconduct or any other testing irregularity that could compromise the integrity of the exam. Failure to abide by these terms and conditions can and will result in the cancellation of your exam score and/or pursuit of any other legal remedies available to NABBBLM.*

Checklist for preparing for the online exam

Before Check-in:

1. You will need proper internet connectivity, computer configuration and video-enabled smartphone for the examination. For information on optimizing online test-taking, please visit <https://app.fasttestweb.com/testing/pr/87/6?rldbqn=1>
2. **Your online test will be remotely proctored by www.ascproctor.com**
 - a. Go to **www.ascproctor.com** --> click on 'Select Your School/Organization'--> click on *North American Board of Breastfeeding and Lactation Medicine*--> Enter your information--> launch chat with live proctor. Once you've established communication with your proctor, they will have all the information needed for you to launch your exam. If you are having trouble connecting to the proctor, please visit [Trouble connecting?](#) for troubleshooting.

Check-in:

1. Please have your government-issued photo identification document (ID) (e.g. driver's license, passport, military ID) to present to the proctor. You will need to have the ID within reach, and your face must be fully visible.
2. You will also need a secondary camera for this proctoring process- most use their smartphones, but you can use a tablet. The proctor will walk you through this set up process.

Test Day Rules

1. You must take your exam in a private area with no other persons or animals present in the room.
2. You are permitted to have a smartphone stand, extension cord (to help scan the room using your computer), a beverage, and tissues in a closed pack.
3. You are not permitted to have any recording devices on the desk or within reach.
4. You are not permitted to have any examination related materials posted in the room.
5. You are not permitted to have any unauthorized programs running on your desktop computer/laptop/tablet during the examination.
6. You are not permitted to be connected to a virtual network.
7. You may only have a single computer monitor.
8. You are not permitted to be connected to an email program or search engine other than what is being used for the examination.
9. You are not permitted to have any programs that are recording in the background running.
10. You are not permitted to have any open documents available.
11. You are not permitted to use any unauthorized headphones during the examination.
12. Maintain silence- refrain from unnecessary conversations except to the proctor.
13. You are not permitted to make or receive phone calls or text messages while writing the examination.
14. Your webcam, speakers and microphone on your cellular smartphone or tablet and your computer must remain active throughout the examination.
15. You must remain in view of the proctor while actively taking the exam.

16. Please plan to use the restroom before beginning the exam, or during a designated break between exam sections. If you take an unscheduled break your test will be terminated.
17. If you get disconnected from the proctor during your session, please stop where you are in your examination and wait for the proctor to call you to provide further instructions. If you are disconnected from the proctor for more than 5 minutes, the proctor is authorized to end your examination session. In the event this takes place, you may not be permitted to complete your examination, your results may be invalid, and you may have to pay additional fees based on the circumstances.
18. You are not permitted to exit the session until the proctor has confirmed the section or examination has been completed or submitted.
19. If the proctor finds you in violation of any of the rules listed above, the proctor is authorized to end your examination session. In the event this takes place, you may not be permitted to complete your examination, your results might be voided, and you may be required to forfeit all fees paid to NABBLM.

During the exam

1. The total maximum test time is 6 hours including breaks. A time clock will run throughout the 6 hours.
 - a. The test will be composed of 3 sections, 50-60 questions in each section. Between sections you have the option of taking up to a 40 minute break. You do not need to stay in the room for the break. You will not be allowed to return to a previous test section after returning from the break.
 - b. When a break comes, the instructions on the screen will say that it is optional, and there will be a 40-minute timer in the top-right corner.
 - c. You must inform your proctor when you are ready to take a scheduled break, using the Chat function on top of your screen, and receive confirmation before leaving your seat. You will be required to go through security checks when you return. Please allow at least 7 minutes of your break time for security checks once you have returned to your desk. Your test will resume after this screen and cannot be paused.

Upon finishing the exam

1. Please notify your proctor using the Chat function on the screen once you have reached the end of your test
2. Report any issues that occur during your test to your proctor immediately. If there was an issue that may have affected your results, you must report it to the ASC proctor within 48 hours of your test. No corrective action will be taken for problems that are reported after scores have been released or more than 48 hours after the test sitting, whichever comes first.

After the Examination

Participants of the pilot exam will receive their exam results by email after standard setting is done, which will be mid November 2023.

Standard setting is a psychometric process used to establish the cut score for a criterion-based examination form. The resulting cut score serves as a pass/fail point for the exam that links exam scores to performance standards and requirements. The standard setting methodology used to establish the cut score for the NABBLM-C is commonly referred to as a modified-Angoff procedure. This method uses ratings from a large, representative panel of subject matters to assess the relative difficulty of questions on the NABBLM-C examination.

Candidates who pass the exam

Candidates who pass the exam will receive an email informing them of their passing result and a formal certificate via mail. Diplomates with a passing score may use NABBLM-C as an acronym for board certification, or use the term 'Board Certified Breastfeeding and Lactation Medicine Physician'. Candidates who have successfully completed all the requirements may use the credential once they have received official notification of NABBLM-C certification. Candidates who have passed the exam may use the awarded designation as long as their certification remains current.

Except as permitted by this policy, any use or display of NABBLM certification marks and/or logos without the prior written permission of NABBLM is prohibited. Any candidate or diplomate who manufactures, modifies, reproduces, distributes or uses a fraudulent or otherwise unauthorized NABBLM certificate, NABBLM designation or other credential may be subject to disciplinary action, including denial or revocation of eligibility for certification. Any individual who engages in such behavior also may be subject to legal action.

Education and training providers may not use the NABBLM name, logos, or certification marks to state or imply any approval or endorsement by NABBLM of the educational materials.

Individuals who have met the certification standards are authorized to use the following certification mark in communications and marketing materials:

- The credential may be designated as NABBLM-C or Board Certified Breastfeeding and Lactation Medicine Physician.
- The credential is typically used after the name following any academic degrees and licensure (e.g., Jane Smith, MD, NABBLM-C).
- The mark must be clearly associated with the individual(s) certified by the NABBLM.

NABBLM reserves the right to include all certified individuals in a public database at the NABBLM website. Individuals may opt out of the public database with written notice to NABBLM.

Candidates who do not pass the exam

Candidates who take the pilot test in October 2023 and do not pass may take the test again at no charge no sooner than 6 months later, and not beyond October 2024. If a candidate does not pass the test a second time, they will need to reapply to take the test.

Candidates who do not pass the exam will receive domain-level score reports, so they are aware of the areas that they need to study, along with how they performed with respect to the cut point.

Appeals & Testing Concerns

We rely on our testing partner to provide a pleasant testing experience for every candidate. We will provide an opportunity for general comments via a survey emailed after the exam. You may also reach out to us via the contact page on the NABBBLM website.

Candidates who fail the exam and believe irregular testing conditions were a contributing factor may file an appeal to the Credentials Committee. All appeal requests must be made in writing and postmarked or emailed within 30 days from the receipt of the exam score report. All appeals must describe the suspected error or problem and the requested remedy. The Credentials Committee will review the information and make a final decision within 30 days of receipt. The decision of the Committee shall be final.

If you have an examination issue that you would like to have directly addressed, please contact NABBBLM at admin@nabblm.org. Processes for specific issues are outlined below.

To appeal a certification decision, please submit an appeal request to admin@nabblm.org that describes the reason for the certification decision appeal.

- Please attach all supporting documentation that provides evidence for your appeal.
- Once the NABBBLM office has received this information, it will be sent to the NABBBLM Credentials Committee who reviews all of the details and supporting evidence. This process may take 30 business days to complete.
- Once a decision has been made, the NABBBLM office will contact you via email with the decision.

NABBBLM-C Re-certification

No recertification test is required for individuals who have been certified NABBBLM-C. The NABBBLM certification is valid for 5 years from the date of receipt of notification of earning the certification. To maintain certification beyond 5 years one must remain active in the NABBBLM Maintenance of Certification (MOC) Program.

The NABBBLM MOC program will be clinically focused at a reasonable cost (estimated \$150 per year to start). The MOC program will include continuing education activities with the goal of keeping abreast of evidence-based Breastfeeding and Lactation Medicine.

Code of Ethical and Professional Conduct

NABBLM is an autonomous multidisciplinary board that provides direction for and administers the certification process for physicians in Breastfeeding and Lactation Medicine

NABBLM is committed to maintaining a high level of excellence in practice, ethical conduct and integrity by its Board and its diplomates.

As such, a Board Certified Breastfeeding and Lactation Medicine Physician (NABBLM-C)

- should never represent themselves either directly or indirectly, as anything other than an NABBLM-C unless they hold other license/certification that allows them to do so.
- should practice within the scope of their knowledge, skills, and abilities.
- will not provide services that are limited by state, provincial, or territorial law to provision by another health care professional only.
- must remain in good standing relative to governmental requirements as a condition of continued credentialing.
- should take credit, including authorship, only for work they have actually performed and give credit to the contributions of others as warranted.
- shall maintain a professional knowledge and skill level required to ensure that patients and families receive excellent medical care based on current evidence by participating in and completing maintenance of certification requirements.
- shall accept no personal compensation from any party that would influence or require special consideration in the provision of care to any patient.
- shall adhere to the principles and aims of the International Code of Marketing of Breastmilk Substitutes.
- shall cooperate in every reasonable and proper way with other physicians and work with them in the advancement of quality patient care.
- shall be dedicated to providing competent and legally permissible services within the scope of the Knowledge and Skills (KSs) of their respective credential.
- shall provide services with integrity, competence, diligence, and compassion.
- shall provide Breastfeeding and Lactation Medicine information in a manner that is consistent with evidence-based science and medicine.
- shall respect the rights of clients, colleagues, and health professionals, and shall safeguard client confidences within the boundaries of the law.
- shall maintain confidentiality and do not communicate to a third party not involved in that client's care without the prior written consent of the client or as required by law.
- will be truthful about their qualifications and the limitations of their expertise and provide services consistent with their competencies.
- shall provide patient care impartially; provide no special privilege to any individual patient based on the patient's race, color, creed, sex, sexual preference, gender identity, age, national origin or handicap.

Applicants or Diplomates will receive a Denial or Revocation of Certification based on the following conduct:

- Presentation of fraudulent documents or falsifying information when applying for certification or recertification.
- Failure to comply with testing policies during the exam. This would include any misconduct during the exam that could end or void the exam immediately, or any incidents that are brought to light through later audit or review.
- Using a title, designation, credential or license, company name, letterhead, publication, term, title or document which states or implies an ability, relationship or qualification that does not exist.
- Not cooperating with a NABBLM disciplinary investigation or proceeding.
- Attempting to prevent or interfere with a complaint being filed or NABBLM disciplinary investigation or proceeding to occur.
- Failure to abide by the NABBLM Bylaws or any rules or requirements established by the Board, including, but not limited to, NABBLM's Ethical Code and Professional Conduct
- Has a license or certificate to practice medicine suspended, revoked, or otherwise limited.
- Violation or misuse of any of the NABBLM's Intellectual Property Rights
- Offering of any financial or other benefit to any director, officer, employee, proctor, or other agent or representative of NABBLM in return for any right, privilege, or benefit which is not usually granted by NABBLM to other similarly situated candidates or persons.
- Failing to comply with the continuing requirements for diplomate status.

Disciplinary Policy

To maintain and enhance the credibility of the NABBLM-C certification program the NABBLM has adopted the following procedures to allow individuals to bring complaints concerning the conduct of individuals who are candidates or diplomates of the NABBLM.

In the event an individual candidate or diplomate violates the NABBLM Code of Ethical and Professional Conduct, certification rules, or NABBLM policies, the Certification Committee may reprimand or suspend the individual or may revoke certification.

The grounds for sanctions under these procedures may include, but are not necessarily limited to:

- Violation of the NABBLM Code of Ethics and Professional Conduct.
- Violation of established NABBLM policies, rules and requirements.
- Fraud or misrepresentation in an initial application or renewal application for certification.

Information regarding the complaint process will be available to the public via the NABBLM web site or other published documents. A complete copy of this policy will be publicly available.

Actions taken under this policy do not constitute enforcement of the law, although referral to appropriate federal, state/provincial, or local government agencies may be made about the conduct of the candidate or diplomate in appropriate situations. Individuals initially bringing complaints are not entitled to any relief or damages by virtue of this process, although they will receive notice of the actions taken.

Complaints

Complaints may be submitted by any individual or entity. Complaints should be reported to NABBLM in writing and should include the name of the person submitting the complaint, the name of the person the complaint is regarding along with other relevant identifying information, a detailed description of factual allegations supporting the suspected violations, citation to the policy or rule involved, and any relevant supporting documentation.

Information submitted during the complaint and investigation process is considered confidential and will be handled in accordance with NABBLM'S Confidentiality Policy. Inquiries or submissions other than complaints may be reviewed and handled by NABBLM or its staff members at its discretion.

Upon receipt and preliminary review of a complaint involving the certification program, the NABBLM staff consultation with the Credentials Committee may conclude, in their sole discretion, that the submission:

- contains unreliable or insufficient information, or
- is patently frivolous or inconsequential.

In such cases, the NABBLM Credentials Staff may determine that the submission does not constitute a valid and actionable complaint that would justify bringing it before the Committee for investigation and a determination of whether there has been a violation of substantive requirements of the certification process. If so, the submission is disposed of by notice from the Credentials Staff to the submitter, if the submitter is identified. All such preliminary dispositions by the Chair are reported to the Committee at its next meeting.

Preliminary review will be conducted within 30 calendar days of receipt of the complaint.

If a submission is deemed by the Committee or Credentials Staff to be a valid and actionable complaint, the Committee shall see that written notice is provided to the candidate/diplomate whose conduct has been called into question. The candidate/diplomate whose conduct is at issue shall also be given the opportunity to respond to the complaint. The Committee also shall ensure that the individual submitting the complaint receives notice within 30 days of receipt that the complaint is being reviewed by the Committee.

Complaint Review

For each complaint that the Committee concludes is a valid and actionable complaint, the NABBLM authorizes an investigation into its specific facts or circumstances to whatever extent is necessary in order to clarify, expand, or corroborate the information provided by the submitter.

The Committee appoints a Complaint Review Committee. The Complaint Review Committee initially determines whether it is appropriate to review the complaint under these procedures or whether the matter should be referred to another entity engaged in the administration of law. The timeline for responses and for providing any additional information shall be established by the Complaint Review Committee. The review and investigation will be completed in an appropriate amount of time, not to exceed six months, unless there are extenuating circumstances that require an extended time period. The Complaint Review Committee may be assisted in the conduct of its investigation by NABBLM staff or legal counsel. The Chair exercises general supervision over all investigations.

Both the individual submitting the complaint and the candidate/diplomate who is the subject of the investigation (or their employer) may be contacted for additional information with respect to the complaint. The Complaint Review Committee, or the Credentials Committee on its behalf, may at its discretion contact such other individuals who may have knowledge of the facts and circumstances surrounding the complaint.

All investigations and deliberations of the Complaint Review Committee and the Credentials Committee are conducted in confidence, with all written communications sealed and marked "Personal and Confidential," and they are conducted objectively, without any indication of prejudgment. An investigation may be directed toward any aspect of a complaint which is relevant or potentially relevant. Formal hearings are not held and the parties are not expected to be represented by counsel, although the Complaint Review Committee and Credentials Committee may consult their own counsel.

Determination of Violation

Upon completion of an investigation, the Complaint Review Committee recommends whether the Credentials Committee should make a determination that there has been a violation of NABBLM policies and rules. When the Complaint Review Committee recommends that the Credentials Committee find a violation, the Complaint Review Committee recommends imposition of an appropriate sanction. If the Complaint Review Committee so recommends, a proposed determination with a proposed sanction is prepared under the supervision of the Chair and is presented by a representative of the Complaint Review Committee to the Credentials Committee along with the record of the Complaint Review Committee's investigation.

If the Complaint Review Committee recommends against a determination that a violation has occurred, the complaint is dismissed with notice to the candidate/diplomate, the candidate/diplomate's employer, and the individual or entity who submitted the complaint; a summary report is also made to the Credentials Committee.

If the Complaint Review Committee recommends a determination that a violation has occurred, The Credentials Committee reviews the recommendation of the Complaint Review Committee based upon the record of the investigation. The Credentials Committee may accept, reject, or modify the Complaint Review Committee's recommendation, either with respect to the determination of a violation or the recommended sanction to be imposed. If the Credentials Committee makes a determination that a violation has occurred, this determination and the imposition of a sanction are promulgated by written notice to the candidate/diplomate.

In certain circumstances, the Credentials Committee may consider a recommendation from the Complaint Review Committee that the candidate/diplomate who has violated the certification program policies or rules should be offered an opportunity to submit a written assurance that the conduct in question has been terminated and will not recur. The decision of the Complaint Review Committee to make such a recommendation and of the Credentials Committee to accept it are within their respective discretionary powers. If such an offer is extended, the candidate/diplomate at issue must submit the required written assurance within thirty days of receipt of the offer, and the assurance must be submitted in terms that are acceptable to the Credentials Committee.

Sanctions

Any of the following sanctions may be imposed by the Credentials Committee upon a candidate/diplomate whom the Credentials Committee has determined to have violated the policies and rules of its certification program(s), although the sanction applied must reasonably relate to the nature and severity of the violation, focusing on reformation of the conduct of the member and deterrence of similar conduct by others:

- written reprimand to the candidate/diplomate;
- suspension of the diplomate for a designated period; or
- suspension of the candidate's application eligibility for a designated period; or
- termination of the diplomate's certification

- termination of the candidate's application eligibility for a designated period.

For sanctions that include suspension or termination, a summary of the final determination and the sanction with the candidate/diplomate's name and date is published by the Credentials Committee and NABBLM.

Those who have been terminated shall have their certification revoked and may not be considered for certification in the future. If certification is revoked, any and all certificates or other materials requested by the Credentials Committee must be returned promptly to the Committee.

Appeal

Within thirty (30) days from receipt of notice of a determination by the Credentials Committee that a candidate/diplomate violated the certification program policies and/or rules, the affected candidate/diplomate may submit to the Credentials Committee in writing a request for an appeal.

Upon receipt of a request for appeal, the Credentials Committee establishes an appellate body called the Appeal Committee. The majority of members should hold a current NABBLM certification. The Appeal Committee may review one or more appeals, upon request of the Chair of the Credentials Committee. No current members of the Complaint Review Committee or the Credentials Certification Committee may serve on the Appeal Committee; further, no one with any personal involvement or conflict of interest may serve on the Appeal Committee. Appeal committee members must not be involved in the original decision.

The Appeal Committee may only review whether the determination by the Credentials Committee of a violation of the certification program policies and/or rules was inappropriate because of material errors of fact, or failure of the Complaint Review Committee or the Credentials Committee to conform to published criteria, policies, or procedures.

Only facts and conditions up to and including the time of the Credentials Committee's determination as represented by facts known to the Credentials Committee are considered during an appeal. The appeal shall not include a hearing or any similar trial-type proceeding. The Credentials Committee and Appeal Committee may consult legal counsel.

The Appeal Committee conducts and completes the appeal within ninety days after receipt of the request for an appeal. Written appellate submissions and any reply submissions may be made by authorized representatives of the member and of the Council. Submissions are made according to whatever schedule is reasonably established by the Appeal Committee. The decision of the Appeal Committee either affirms or overrules the determination of the Credentials Committee but does not address a sanction imposed by the Credentials Committee.

The Appeal Committee decision is binding upon the Credentials Committee, the candidate/diplomate who is subject to the termination, and all other persons.

Resignation

If a diplomate who is the subject of a complaint voluntarily surrenders their certification at any time during the pendency of a complaint under these Procedures, the complaint is dismissed without any further action by the Complaint Review Committee, the Credentials Committee, or an Appeal Committee established after an appeal. The entire record is sealed, and the individual may not reapply for certification by the NABBLM. However, the Credentials Committee may authorize the Credentials Committee Chair to communicate the fact and date of resignation, and the fact and general nature of the complaint, which was pending at the time of the resignation, if requested by a government entity engaged in the administration of law. '