



Fi360 Certification Policies and Procedures

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1. Overview

Scope of Accredited Investment Fiduciary Certification

The purpose of the Accredited Investment Fiduciary certification is to assure that those responsible for managing or advising on investor assets have a fundamental understanding of the principles of fiduciary duty, the standards of conduct for acting as a fiduciary, and a process for carrying out fiduciary responsibility.

About Fi360 and The Center for Fiduciary Studies

Fi360 has been providing innovative solutions to financial services providers and other investment fiduciaries since 1999. Solutions include the AIF® and AIFA® Certification programs, fiduciary training programs for organizations and individuals, the Fiduciary Focus Toolkit™ software, and the Fi360 Fiduciary Score® investment scoring methodology.

The Center for Fiduciary Studies is comprised of the Certification Oversight Committee (“COC”) and its advisory commissions. The Center independently makes essential certification decisions related to standards, policies, and procedures of the certifications, as well as certification decisions regarding applicants and certified individuals.

2. Fairness, Impartiality, and Non-Discrimination

Fairness

Fi360 adheres to principles of fairness and due process and endorses the principles of equal opportunity. In administering the certification program Fi360 shall not discriminate or deny opportunity to anyone on the grounds of gender, age, religion, national or ethnic origin, marital status, veteran status, sexual orientation, or disability.

Impartiality

Fi360 adheres to principles of impartiality in all its dealings. Fi360 shall act impartially toward all applicants, candidates and certificants. Fi360 enforces its commitment to impartiality by continually monitoring processes to assure impartiality. Any complaint or indication of partiality is taken seriously and acted upon to mitigate the perceived or reported cause of partiality. Fi360 will not allow external commercial pressures or internal corporate pressures to compromise impartiality.

Statement of Non-Discrimination

Fi360 is committed to principles of equal opportunity and diversity. Eligibility criteria for eligibility, examination, and certification as an Accredited Investment Fiduciary (AIF) are applied equally to all individuals without regard to race, color, religion, sex, national origin, disability, marital status, veteran status, sexual orientation, genetic information, or other basis protected by federal, state, or local law. All employees of Fi360 are expected to conduct themselves in the workplace and in regard to certification decisions in a manner consistent with these principles and with the policies specified in the Employee Handbook.

3. AIF® - Initial Requirements

There are five requirements for attaining the AIF® designation:

1. Enroll in and complete AIF® Training that satisfies AIF training requirements
2. Pass the AIF® Examination
3. Meet the [experience requirement](#) (prerequisites)
4. Satisfy the [Code of Ethics](#) and [Conduct Standards](#)
5. Submit the application and dues

All requirements must be met within one (1) year of passing the Examination. After one year, a candidate must retake and pass the exam to meet the examination requirement for certification.

4. Training

Completion of AIF® Training is required to attain the AIF® designation. It is available from Fi360 in two formats, and takes approximately 8-10 hours to complete the online component (not including personal study time). The Capstone format includes an additional 6-8 hours of instructor-led course review.

- Self-paced Online format (“Online”)
- Capstone format (“Capstone”)

Access to the online content is available for ninety (90) days with the online format, and one hundred eighty (180) days with the Capstone format. Upon expiration, a ninety (90) day extension may be purchased for a fee of \$150.

A refund is available within seventy two (72) hours of purchase provided the online content has not been accessed, and the request is made at least twenty one (21) days prior to the instructor-led seminar (if applicable).

5. Examination

A minimum score of 70% on the AIF® examination is required to attain the AIF® designation. The proctored exam is a timed, closed-book assessment of the *Prudent Practices* and methodology, as well as their proper application. It consists of eighty (80) multiple choice questions with a time-limit of one hundred twenty (120) minutes. Re-testing is governed by the [examination retake](#) policy.

The examination must be attempted within one (1) year from the date of its purchase. After one year, access will be revoked and the examination must be repurchased.

A refund is available for seventy two (72) hours from the date of purchase provided the examination has not been accessed.

6. AIF Exam Blueprint

The exam will include 80 items, of which only 70 will count toward the candidate score. All items will be multiple-choice single-response questions. Candidates will have up to two hours to complete the exam. The outline below shows the number of scored items that will be included in each of the four content domains.

1. Organize. Fiduciary Roles and Responsibilities Are Clearly Documented and Defined (15 to 19 items)

- 1.1. Demonstrate an awareness of fiduciary duties and responsibilities.
- 1.2. Provide investments and investment services consistent with governing documents.
- 1.3. Document the roles and responsibilities of all involved parties, whether fiduciaries or non-fiduciaries.
- 1.4. Identify, then avoid or manage, material conflicts of interest in a manner consistent with the duty of loyalty.
- 1.5. Execute written agreements that contain no provisions conflicting with fiduciary obligations.
- 1.6. Prudently protect sensitive personal identifying information and assets of clients from theft, embezzlement, and business disruption risks.

2. Formalize. The Investment Policy is Consistent with the Portfolio's Objectives and Risk and Return Assumptions (17 to 21 items)

- 2.1. Identify an investment .time horizon for each investment objective of the client.
- 2.2. Identify an appropriate risk level for the portfolio.
- 2.3. Evaluate the distribution of projected portfolio returns in the context of the client's risk and return objectives.
- 2.4. Ensure that selected asset classes are consistent with the portfolio's time horizon and risk and return objectives.
- 2.5. Ensure that selected asset classes are consistent with implementation and monitoring constraints.
- 2.6. Confirm that the investment policy statement contains sufficient detail to define, implement, and monitor the portfolio's investment strategy.
- 2.7. Apply environmental, social, and governance (ESG) factors to investment due diligence in conformity to governing documents and the fiduciary obligations of investment decision-makers.

3. Implement. Decisions Regarding Investments and Services are Implemented in Accordance with the Duties of Loyalty and Care (15 to 19 items)

- 3.1. Follow a prudent due diligence process to select each service provider.
- 3.2. Implement statutory or regulatory investment safe harbors in compliance with the applicable provisions.

3.3. Make and document decisions regarding investment strategies and types of investments in accordance with fiduciary obligations.

4. Monitor. The Portfolio is Monitored Regularly to Ensure Consistency with Benchmarks and Overall Objectives (15 to 19 items)

4.1 Conduct periodic reviews of investment performance against appropriate market and peer group benchmarks and overall portfolio objectives.

4.2. Conduct periodic reviews of qualitative and/or organizational changes of investment managers and other service providers.

4.3. Conduct periodic reviews of policies for trading practices and proxy voting.

4.4. Conduct periodic reviews to ensure that investment-related fees, compensation, and expenses are fair and reasonable for the services provided.

4.5. Conduct periodic reviews of the organization's effectiveness in meeting its fiduciary responsibilities.

7. Exam Administration

For a valid exam attempt to occur, the following conditions and procedures must be met and verified:

- A valid proctor must be selected and confirmed with Fi360. (See proctor guidelines on Fi360.com: <https://fi360.zendesk.com/hc/en-us/articles/205490678-Proctor-Regulations-Guidelines>)
- The candidate must have a suitable location to take the exam, including uninterrupted access to a location with reliable internet access for up to 150 minutes (approx. 30 minutes for setup and up to 120 minutes allotted for the exam attempt)
- The candidate may not have any study aids. The candidate may only have a blank piece of paper and writing tool for note taking. The proctor must take possession of any notes at the conclusion of the exam and properly destroy the paper.

8. Accommodations

All candidates must meet the minimum prerequisite standards and the assessment requirements. Accommodations for the assessment conditions can be made in the event of special needs, such as under ADA or for ESL candidates. Any accommodations must ensure impartiality. Examples of accommodations may include providing extra time, taking a paper-based exam, or allowing for a volunteer to read questions aloud for the test taker. A request for accommodation can be made by following the Policy Exceptions Procedure, found below.

9. Policy Exceptions

Fi360 is committed to fair and uniform application of its policies and procedures to all parties. Exceptions are granted, rarely, only when justified by extraordinary circumstances that can be supported with documentation.

To request an exception, please submit a written description containing:

1. The policy for which an exception is being requested
2. An explanation in favor of an exception
3. Documentation of the extraordinary circumstance(s) justifying an exception

All policy exception requests will be reviewed by the Designations department, and should be submitted to professional.development@Fi360.com. Please allow ten (10) business days for a written decision from Fi360. All decisions are final.

10. Proctors

Qualification

The examination must be completed under the supervision of an acceptable proctor. The requirement for a proctor helps to ensure the integrity of the examination process as one of the rigorous requirements for attaining certification. All exam proctors must be responsible adults over the age of 25. Proctors must have an employment history of assiduously following directions and adhering to employment guidelines provided.

Full proctor guidelines are located in the *Fi360 Proctor Regulations and Guidelines*.

Agreement

When selecting their own proctor, candidates must submit their proctor to Fi360. Fi360 will then contact the proctor via email to secure a *Proctoring Agreement*.

Proctors must execute the *Proctoring Agreement* which obligates them to conform to the guidelines provided and to observe candidate privacy and test security in all procedures.

Duties

For all exams, the accepted proctor will be provided with written instructions documenting in detail the test administration procedures. See separate document *Fi360 Proctor Instructions*. The proctor is required to report all irregularities, breaches of security, or other issues which occurred during the testing session.

Conflict of Interest

Instructors may not serve as proctors for candidates they have instructed within the past two years. In the event a proctor personally knows a candidate he/she is proctoring, the proctor shall take extra care

to avoid any threat to objectivity and must note the candidate's name and relationship to the proctor in the comments section of the *Fi360 Proctoring Instructions*.

Audit

If the candidate's designation application is selected for audit, Fi360 personnel will contact the proctor to verify authenticity of relationship with the candidate and proper protocol was followed. If it is determined the candidate falsified the proctor or submitted an unacceptable proctor, their designation application will be subject to discipline as detailed in the *Qualification and Complaint Procedure*.

11. Fi360 Proctor Regulations and Guidelines

Successful completion of the examination is one of the requirements for attaining an Fi360 Designation, and anyone seeking to achieve that end is eligible to sit for it. If you are taking the online, on-demand version of the exam, you will need to provide a proctor who meets the specified criteria.

Administration

The examination must be completed under the supervision of an acceptable proctor. The requirement for a proctor helps to ensure the integrity of the examination process as one of the rigorous requirements for attaining certification. All exam proctors must be responsible adults over the age of 25. Proctors must have an employment history of assiduously following directions and adhering to employment guidelines provided.

The following are some examples of both acceptable and unacceptable proctors:

Acceptable	Unacceptable
Fi360 personnel	Individual currently enrolled in Fi360 AIF® training
Testing center	Individual currently enrolled in AIF® exam
Public librarian	Friend
Human Resources professional	Spouse/relative
Compliance professional	Close co-workers, anyone in a supervisor-supervisee relationship, or that otherwise has an interest in the candidate becoming a designee.

In order to register a proctor, go to your AIF® Examination in Courses & Exams, and click the link "Email Exam Code to Proctor". Enter your proctor's email address. The proctor will immediately receive an email regarding instructions for administering the examination. You may then coordinate with your proctor directly to schedule the examination attempt.

The exam must be taken within one (1) year from the date of its purchase.

A proctor request will need to be resubmitted to Fi360 for any exam retake. Even if the same proctor is being used, it must be resubmitted.

If the candidate's designation application is selected for audit, Fi360 personnel will contact the proctor to verify authenticity of relationship with the candidate and proper protocol was followed. If it is

determined the candidate falsified the proctor or submitted an unacceptable proctor, their designation application will be subject to discipline as detailed in the Qualification and Complaint Procedure.

Please note, if you accidentally enter the wrong information into the Proctor regulations and guidelines form, you can re-enter the correct information at any time. Just go into the form, delete the incorrect information, and re-enter the correct information.

12. Experience Requirement

One of the following combinations of education, industry experience, and/or professional development will meet the experience requirement for applying for the AIF® designation:

- Minimum of two (2) years of relevant experience; a bachelor's degree (or higher); and a professional designation.
- Minimum of five (5) years of relevant experience; a bachelor's degree (or higher) or a professional designation.
- Minimum of eight (8) years of relevant experience.

Relevant experience is that which has been accrued in a non-clerical role within the financial services (or a related) industry.

A degree must be awarded by an accredited U.S. college or university. International degrees may be substituted for a U.S. degree if they receive equivalency from a third-party evaluation agency that is a member of the National Association of Credential Evaluation Services (NACES).

A professional designation is one conferred by a recognized body within the financial services industry. Candidates must meet all established initial and ongoing requirements and be in good standing. Fi360 reserves the right to make a final determination on whether a designation meets its criteria.

A candidate who fails to meet the experience requirement may petition to have the Center consider other forms of experience as a substitute for the listed requirements. These may include additional fiduciary and/or investment trainings or qualified references made on the candidate's behalf.

13. Code of Ethics

On an annual basis, candidates and designees must review and attest to the Code of Ethics.

I recognize that this Code of Ethics, and its principles and obligations, are in addition to those set forth by any other Code that governs my professional and ethical conduct.

To my clients, I will:

1. Employ and provide the client information on the Prudent Practices when serving as an investment fiduciary and/or advising other investment fiduciaries.
2. Act with honesty and integrity and avoid conflicts of interest, real or perceived.
3. Ensure the timely and understandable disclosure of relevant information that is accurate, complete, and objective.
4. Be responsible when determining the value of my services and my form of compensation; taking into consideration the time, skill, experience, and special circumstances involved in providing my services.
5. Know the limits of my expertise, and refer my clients to colleagues and/or other professionals in connection with issues beyond my knowledge and skills.
6. Respect the confidentiality of information acquired in the course of my work, and not disclose such information to others, except when authorized or otherwise legally obligated to do so. I will not use confidential information acquired in the course of my work for my personal advantage.
7. Not exploit any relationship or responsibility that has been entrusted to me.

To my community (whether defined by work, family, and/or friends), I will:

1. Proactively promote and be a steward of ethical behavior as a responsible partner among my peers in the work environment and in my community.
2. Ensure that the overall promotion of my practice is implemented in the best interests of my profession.
3. Seek, accept, and offer honest criticism of technical work; acknowledge and correct errors; and properly credit the contributions of others.
4. Use corporate assets and resources employed or entrusted to me in a responsible manner.
5. Continue to improve my knowledge and skills, share ideas and information with colleagues, and assist them in their professional development.

14. Conduct Standards

The Conduct Standards pertain to criminal and civil litigation, regulatory events, and personal and professional conduct. Self-disclosure of such events is required when applying for the AIF® designation, as is ongoing disclosure.

Each candidate for a designation must meet the following conduct standards; designees must annually review and attest to the Conduct Standards as part of recertification requirements.

1. Status Standards

No candidate for a Designation (or Designation holder) may be any of the following:

a. Felon

A person who, within the last 10 years, has been convicted of, or against whom a guilty plea has been entered with respect to, a felony under the criminal laws of the United States, any State, or any foreign jurisdiction.

b. Financial Criminal / Civil Defendant

A person who, within the last ten (10) years,

- i. has been convicted of, or against whom a guilty plea has been entered with respect to, a crime other than a felony, or
- ii. is the subject of an administrative or enforcement order by a financial regulatory agency, or
- iii. has been a non-prevailing defendant in a civil or criminal cause of action, per guidelines below, which in any of the above cases involves misrepresentation, fraud, extortion, conversion, misappropriation, fiduciary breach, theft, or other similar violation of the laws or any administrative rules of the United States, any State, or any foreign jurisdiction.

c. Suspended from the investment profession

A person who, within the last two (2) years, has been barred or suspended, as to any form of activity, as a disciplinary measure from registration under the securities laws or regulations (or similar laws or regulations relating to the investment process) of the United States, any State, or any foreign jurisdiction, or from association or affiliation with a self-regulatory organization with legal authority over the investment process.

2. Violations

A candidate for a Designation (or Designation holder) who commits any of the following acts or omissions may be subject to sanctions:

a. False or misleading statement

Intentionally or recklessly makes a misleading statement or omission with respect to a candidate's application for a Designation, a Designation holder's application for renewal, or during an investigation of a Designation holder's satisfaction of these standards.

b. Failure to respond or cooperate

Fails to respond to any request for information or otherwise failing to cooperate in any investigation of a candidate's or Designation holder's satisfaction of these standards.

c. Failure to report pending action

Fails to expeditiously report any violation of the status standards, or any decision by a court, regulatory agency, or administrative agency that is likely to evidence that the Designation holder engaged in unprofessional conduct.

d. Bankruptcy

Filed for, or been forced into, bankruptcy due to failure of a financial services related business during the last five (5) years.

e. Code of Ethics

Violates or fails to satisfy the Code of Ethics.

f. **Unprofessional Conduct**

Engages in unprofessional conduct, which may include without limitation (a) any act or omission that results in a civil finding by a court of competent jurisdiction or by arbitration of a fiduciary breach by the candidate or Designation holder within the last ten (10) years, (b) any act or omission that results in the divestiture or revocation of a professional designation or license or other reprimand relating to fiduciary conduct, (c) any censure by an administrative agency relating to fiduciary conduct within the last ten (10) years, (d) any negligent, false, or misleading statement or omission with respect to a candidate's application for a Designation or during an investigation of a Designation holder's satisfaction of these standards, (e) any failure of a Designation holder to report to the Center for Fiduciary Studies the Designation holder's violation of these Conduct Standards, or (f) any conduct unbecoming of a Designation holder or discrediting the Designation.

15. Application Process

In order to attain and retain the AIF®, AIFA®, or PPC® designation, completion of the Designation Application is required. The application is online-only and available via the Fi360.com website. The application consists of five parts:

1. **Background Info** - This section allows for input of contact information, as well as any financial services-related credentials held that would contribute towards meeting the initial certification requirements.
2. **Education** - Allows for input of the highest post-secondary degree attained that would contribute towards meeting the initial certification requirements. A candidate who has not completed a college degree is not required to complete this section.
3. **Work History** - This section allows for input of work experience accrued in the financial services, or related, industry that would contribute towards meeting the initial certification requirements.
4. **Conduct Standards** - This section allows for responses to questions related to past criminal and civil litigation, regulatory events, and personal and professional conduct. It is designed as a questionnaire to evaluate whether a candidate meets the AIF® Conduct Standards. Any affirmative responses will be reviewed by Fi360's Professional Development staff, and may preclude an individual from attaining/retaining the AIF® Designation.
5. **Code of Ethics** - This section allows for attestation to the tenets of ethical conduct required to attain and retain the AIF® Designation and must be read and affirmed.

16. Fees

The fee for application for the AIF® designation is the first year's dues, currently set at \$325.

Refunds

Dues are typically non-refundable. Dues are required annually in order to retain any Fi360 designation. Along with the other ongoing requirements, the dues must be remitted prior to expiration of the designation's active status. Late payments are subject to a non-refundable reinstatement fee. An extended period of lapse will result in additional reinstatement requirements (see Reinstatement policy).

17. Audit

Fi360 randomly audits 5% of new and renewing designation applications. Upon submission, an audit may be conducted to ensure compliance with, and maintain the integrity of, the designation-granting process. Individuals who are selected for a random audit will be notified as such, and will have ten (10) business days from the date of the request to respond with any requested documentation. In the event any deficiencies are determined, individuals will have thirty (30) days to correct them (e.g., report additional CE hours).

Examples of requested documentation may include proof of graduation (e.g., copy of diploma, transcript) from an educational institution, proof of employment, letter of good standing for a professional designation/license, and past criminal and civil litigation, regulatory event, and financial bankruptcy records.

Another type of audit is one by an affirmative response to a question within the Conduct Standards Questionnaire. If an applicant submits a violation of the Conduct Standards, the audit is subject to the Qualification and Complaint Procedure and could take up to 30 calendar days to complete.

18. AIF[®] - Recertification Requirements

The following steps must be completed annually in order to retain the AIF[®] designation:

1. [Accrue and report six \(6\) hours of continuing education \(CE\)](#), four of which must be delivered by Fi360 or one of Fi360's approved CE providers.
2. Satisfy the [Code of Ethics](#) and [Conduct Standards](#)
3. Submit the application and dues (\$325)

General

The renewal cycle is established by the credential award date, rather than a calendar year.

Continuing Education (CE)

CE must be accrued and reported each year to retain your designation. The CE requirement is effective immediately upon attainment of the designation, and CE hours may be accrued from a variety of sources and activities (see CE policy). Designees must complete new (unique) hours of CE each reporting period. CE modules may not be repeated. All CE is subject to audit by, and final approval from, Fi360.

Application

The renewal application must be reviewed and updated in order to retain any Fi360 designation. Any changes in contact information, work history, or education should be noted, and attestations to the Conduct Standards and Code of Ethics are required.

Dues

The non-refundable dues are required annually in order to retain any Fi360 designation. Along with the other ongoing requirements, the dues must be remitted prior to expiration of the designation's active status. Late payments are subject to a non-refundable reinstatement fee. An extended period of lapse will result in additional reinstatement requirements (see Reinstatement policy).

Renewal Notifications

Renewal notices are provided beginning two months prior to expiration of the designation's active status. Because the primary method of contact is email, the domain 'Fi360.com' should be "whitelisted" to prevent notices from being caught in an email filtering system. Equally important is maintenance of current contact information, especially email address, to facilitate correspondence with Fi360.

Failure to Renew

If the renewal process is not completed by the last day of the month in which your designation expires, all rights and privileges associated with an Fi360 designation – including use of the licensed trademarks – must be relinquished immediately. Reinstatement following failure to renew is subject to a non-refundable reinstatement fee.

19. Designee Qualification and Compliant Procedure

Potential violations of the Conduct Standards or Code of Ethics are subject to the *Designee Qualification and Complaint Procedure*. The policy related to designee qualification, complaints, assessment, sanctions, reinstatement and appeals.

Full details of the *Designee Qualification and Complaint Procedure* can be found on the Fi360 website here: <https://fi360.zendesk.com/hc/en-us/articles/203684248-Complaint-Procedure>

20. Candidate Application Statement

Instructions

All applicants for a designation from Fi360 must acknowledge that they have read, understand, and agree to the following *Candidate Application Statement* and agree to all policies, procedures, and terms and conditions of designation in order to be eligible for the designation.

Candidate Applicant Statement

I hereby apply for certification by Fi360. I understand that my certification depends on my ability to meet all requirements and qualifications. I certify that the information contained in this application is

true, complete, and correct to the best of my knowledge and is made in good faith. I understand that Fi360 may need to gather additional information to clarify or supplement this application and I agree to supply it. I further understand that if any information is later determined to be false, Fi360 reserves the right to revoke any certification that has been granted on the basis thereof.

Should I be awarded the designation that I am applying for, I agree to abide by the Fi360 *Conduct Standard, Code of Ethics*, and all policies and procedures as outlined in this AIF Candidate Handbook. I will notify Fi360 if at any time I develop the incapacity to perform my professional responsibilities in accord with the standard of the designation that I am seeking or otherwise fall outside of the requirements for the designation.

I acknowledge that I may submit application for accommodation of disability related needs.

Should Fi360 suspend my designation at any time, during the suspension I will not use the logo or marks of certification. Should Fi360 withdraw my certification at any time, I will cease use of the designation and the logo. If and when I otherwise fail to maintain active status as a designee, I will cease use of the designation and logo.

In the using an Fi360 designation and logo, I will abide by the restrictions and conventions stated in the *AIF Candidate Handbook*. If notified of misuse by Fi360, I will correct my use of the designation and logo as requested by Fi360.

I hereby release, discharge, and exonerate Fi360, its directors, officers, members, representatives, and agents from any actions, suits, obligations, damages, claims, or demands arising out of, or in connection with, any aspect of the application process including results or any other decision that may result in a decision to not issue me a certificate.

21. Updates and Version History

When updates are made to this handbook, a new version will be created reflected in the below version history. When substantive updates are made to certification or recertification requirements, the *Code of Ethics* or *Conduct Standards*, or substantive updates to standards or procedures, Fi360 will take appropriate measures to publicize those changes, such as by updating the Fi360.com website or sending email notification to those affected.

Date	Version	Author	Description/Comments
1/11/19	1.0	Ben Aikin, Matt Burt	Original Version