



Certification Consultant's Statement on the Membership Requirement for ATA Certification

ATA engaged Knapp & Associates International in April 2020 to prepare an opinion on whether its history of requiring membership as a condition of eligibility for certification is consistent with current practices and quality standards for professional certification programs. The following provides an overview of fundamental concepts related to this topic, followed by our impressions of the membership requirement.

OVERVIEW OF PERTINENT CONCEPTS

General Guidelines for Eligibility Criteria

Eligibility requirements are as critical to the credentialing process as the examination itself. The eligibility requirements and examination comprise a credentialing system. Eligibility criteria should:

- Be consistent with the scope and level of practice (e.g., entry-level, advanced) targeted by the credential.
- Be directly linked to the ability to competently perform the responsibilities of the role targeted by the credential (i.e., essential to acquiring the necessary knowledge and skills).
- Not be used to limit the number of applicants or to exclude qualified candidates.
- Be reasonable and minimally stringent.
- Be balanced—the criteria should not exclude qualified individuals, nor should they be such that unqualified individuals can earn the credential simply by passing the exam.

There should be a documented rationale for each requirement.

It is advisable to permit multiple routes to achieving eligibility, wherever appropriate (e.g., additional years of work experience accepted in lieu of an academic degree).

Quality Standards for Professional Certification Programs

Standards within the certification industry set the baseline for what is expected of a quality certification program that is fair, psychometrically sound, and legally defensible. These standards are also the basis for the accreditation of professional certification programs.

In “Standard 7: Program Policies” of the *Standards for the Accreditation of Certification Programs*, published in 2016 by the National Commission for Certifying Agencies (NCCA), one of the Essential Elements states: “The certification program must not unreasonably limit access to certification.”¹

Additionally, there are the following references to eligibility requirements in the glossary of the *NCCA Standards*:

- **Bias:** Regardless of context (see below) and lack of intent, bias is to be avoided. In the context of eligibility and recertification requirements: avoid inappropriateness or irrelevance of requirements for certification or recertification if they are not reasonable prerequisites for competence in a profession, occupation, role, skill, or specialty area. (See Fairness below.)
- **Eligibility Requirements:** Published criteria, often benchmarks for education, training, and experience, with which applicants must demonstrate compliance to qualify for certification.
- **Fairness:** The principle that all applicants and candidates will be treated in an equitable and consistent manner throughout the entire certification process. (See Bias above.)

Certification Law

In the chapter on certification law in *Certification: The ICE Handbook*, credentialing law experts Jerald Jacobs, Julia Judish, and Dawn Crowell Murphy explain that requiring association membership could constitute an illegal tying arrangement in violation of antitrust laws.

Whatever the reasons for tying membership and certification, caution is warranted here. A substantial body of antitrust law stands for the proposition that tying an undesired service or product to a desired service or product can be anticompetitive and illegal. [Discussion of lawsuits involving certification programs.] The bottom line is that for now, no court is known to have ruled definitively on tying membership to certification, but it may be unacceptably risky to do so given these two prominent settlements in cases involving the issue.²

Practical Implications of Excluding Non-Members from Eligibility

Limitation of Program Volumes:

Excluding otherwise qualified individuals from certification reduces program volumes and constricts the maximum market share the association can expect to capture. Given that in general, certification programs typically capture only a small percentage of the market (unless the credential is required by regulation or the majority of employers), requiring membership further hinders the penetration of the credential. Naturally, this has a direct impact on program revenue and lowers the return on investment.

Limitation of Return on Mission: The more qualified individuals who are certified, the greater the visibility and credibility of the credential and the greater the protection of the public. Thus, limiting the number of qualified individuals who are certified lowers the potential return on mission.

Impact on Stakeholder Perceptions: It's not uncommon for professionals to view the tying of membership to certification as "a money grab." This engenders negative perceptions of the sponsoring organization and may diminish customer loyalty.

IMPRESSIONS OF MEMBERSHIP REQUIREMENT

The preceding Overview of Pertinent Concepts above presents general principles, practices, and standards pertaining to setting eligibility criteria. Arguably, the most important consideration when evaluating whether ATA's membership

requirement for certification conforms to accepted practices and quality standards is:

Is there a direct and exclusive relationship between membership in ATA and acquisition of knowledge and skills required to competently perform the role of the translator or interpreter? That is, must one be a member to become (or be) a competent professional? Is membership the sole avenue to professional competence?

This consideration encapsulates the focus of the practices, standards, and certification law recommendations highlighted in the Overview section above. Our analysis is summarized below.

Certainly, it can be said that ATA offers professional development programs and resources that facilitate the acquisition of knowledge and skills that are requisite to competent performance as a professional translator. However, this does not mean that there is a direct and exclusive relationship between ATA membership and professional competence.

1. It's rare that the offerings of a professional association are the *sole* means of acquiring the professional knowledge and skills required for certification and competent performance. Often, these offerings are not even the primary or most impactful source because individuals gain pertinent knowledge and skills in myriad ways, including through academic programs, formal continuing education, self-directed learning, internships and apprenticeships, mentoring, and work experience in the field. There is no evidence that ATA membership is the only means of developing the capabilities associated with professional competence.
2. Professionals do not need to be ATA members to access the professional development offered by ATA. So, even if ATA were the *only* provider of professional development, it could not be said that membership was *necessary* for, or integral to, competence.
3. Although not a requirement for certification, ATA certification and the examinations and scoring processes

are designed with the assumption that work experience in the field is necessary to having the requisite scope and depth of knowledge and skills. The section on ATA's website entitled, "A Guide to the ATA Certification Program," states that: "ATA certification is a mid-career credential for experienced, professional translators or interpreters."³ Thus, ATA's professional development programs, in and of themselves, are not sufficient to master the knowledge and skills required.

If ATA membership is not requisite to attaining the level of competence targeted by ATA certification, then it would seem that requiring membership as a condition for eligibility is potentially excluding qualified individuals from becoming certified.

CONCLUSION

Based on the above assumptions and analysis, it appears that the policy of requiring ATA membership is contrary to, and inconsistent with, current, accepted practice and quality standards pertaining to professional certification programs. ●

NOTES

1. *Standards for the Accreditation of Certification Programs* (National Commission for Certifying Agencies, 2016), <https://bit.ly/NCCA-standards>.
2. *Certification: The ICE Handbook* (Institute of Credentialing Excellence, 2019), 52-53, <https://bit.ly/ICE-handbook>.
3. "A Guide to the ATA Certification Program," <https://bit.ly/ATA-certification-overview>.



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