

BTL1 POLICIES AND PROCEDURES

Revised: September 17, 2025

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I. ADVISORY GROUP COMPOSITION AND RESPONSIBILITIES

(E2659-24 5.2.1.3[1])

1A POLICY: The BTEC Council for Behavior Technician Level One serves as the Advisory Group according to ANAB Standards. The BTEC Council shall advise certificate program management on issues integral to ensuring the certificate is current, relevant, and valuable to its primary stakeholders. The role of the advisory group is not to take the place of the management team members or their job and responsibilities. The role of the BTEC Council member is to ensure a fair, professional BTL1 program.

1B PURPOSE: To clarify the roles and responsibilities of a Behavior Technician Level One advisory group (from here referred to as BTEC Council or “The Council”) member.

1C PROCEDURE

1C(i). The BTEC Council shall have input into, at minimum, BTL1’s (1) target audience, (2) purpose, (3) scope, (4) requisites, (5) term, (6) intended learning outcomes, (7) instructional design plan, and (8) summative assessment security.

1C(ii). The BTEC Council shall convene to advise certificate program management, at a minimum, (1) when the elements of BTL1 are created or when changes are proposed, and (2) when a program evaluation is conducted.

- Meeting Minutes will serve as evidence of the meetings. Minutes will contain at a minimum:
 - Attendance of all members (voting and non-voting)
 - Outcome of items to be voted and agreed upon (management is excluded from the voting process)
 - On items to be voted on, there must be a majority vote to pass.
 - If there are no more than two voting members in attendance, items will be sent out via email for a vote by existing members (excludes management).

1C(iii). Term Limits. The term limit for non-BTL1 employed members of the BTEC Council shall be three years, with the ability to renew for two terms for a maximum of nine years.

- 1C(iv). The advisory group should include representation from all pertinent stakeholder groups and actively identify possible stakeholders, and continue to recruit new members from all stakeholder areas.
 - Stakeholders are identified as
 - Consumers (those receiving services and/or family members)
 - Providers (those who are providing services either directly or oversight through supervision)
 - Certificate Holders (those who have completed the BTL1 program both past and present)
 - Subject Matter Experts (those who have expertise, are published, or are licensed / certified within the field of applied behavior analysis and Autism Spectrum Disorders)
 - Of the above stakeholders stakeholders (consumers, providers, certificate holders, and Subject Matter Experts), both international and domestic people should be considered
 - Payors, Funding Sources are excluded from the relevant stakeholders due to the conflict of interest and limitation of federal and state laws and regulations of “endorsing” one credentialing mechanism over another.

1C(v). New members can be recommended by current BTEC Council members, or can be found through an application on the website and by reaching out to our stakeholders via social media and/or email. New members must be voted in by a majority vote of the BTEC Council.

1C(vi). All members must fill out the application.

II. INSTRUCTIONAL DESIGN PLAN

(E2659-24)

Instructional Design Plan Policy & Procedure

(Aligned to ANAB ANSI/ASTM E2659-24, Clause 6.1.2)

September 2025

1. Policy

Optimus Education shall maintain and implement a documented instructional design plan for the Behavior Technician Level One (BTL1) Certificate Program. The instructional design plan shall ensure that the program is developed, delivered, and evaluated using a systematic process that:

- Identifies learner and stakeholder needs.
- Designs and develops curriculum aligned with those needs.
- Implements instructional content and activities through an approved learning management system (LMS).
- Evaluates learner performance and program effectiveness.
- Ensures ongoing alignment of program purpose, scope, intended learning outcomes, instructional activities, and summative assessments.

This policy ensures instructional quality, program integrity, and continuous compliance with ANAB ANSI/ASTM E2659-24 standards.

2. Purpose

The purpose of this policy is to:

- Document the instructional design model and processes used by Optimus Education.

- Demonstrate how needs assessments inform and continue to inform the program.
 - Ensure that the certificate program remains consistent with its stated purpose, scope, and target audience.
 - Ensure that all intended learning outcomes are appropriately supported by instructional activities and assessed through valid summative assessments.
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3. Instructional Design Model and Processes

Optimus Education uses the **ADDIE instructional design model (Analysis, Design, Development, Implementation, Evaluation)** to guide program development and continuous improvement.

- **Analysis:** Identify learner needs, regulatory requirements, and workforce demands through stakeholder input, employer feedback, learner surveys, and advisory group (BTEC Council) recommendations.
 - **Design:** Translate needs into measurable learning outcomes that reflect entry-level behavior technician competencies.
 - **Development:** Create instructional materials (videos, role-plays, scenarios, guided practice, assessments) using evidence-based learning strategies.
 - **Implementation:** Deliver the program securely through the Tovuti LMS, ensuring instructor interaction, tracking of learner progress, and timely feedback.
 - **Evaluation:** Review and assess program effectiveness through learner assessments, satisfaction surveys, internal audits, and annual management reviews. Results inform revisions and improvements.
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4. Needs Assessment and Ongoing Use

The initial program development was informed by a comprehensive needs assessment including:

- Workforce analysis of entry-level behavior technician competencies.
- Input from employers, service providers, and families regarding training gaps.
- Professional standards from QABA, IBAO, and BACB.

Ongoing needs assessments occur annually through:

- Student satisfaction surveys and completion data.
- Employer and supervisor feedback.
- Advisory group (BTEC Council) reviews.
- Monitoring of regulatory and statutory updates.

Findings from needs assessments inform the **program purpose, scope, intended learning outcomes, certificate requisites, and certificate term.**

5. Consistency with Purpose, Audience, and Scope

The BTL1 Certificate Program is designed for **entry-level learners preparing to work as behavior technicians under supervision.** Optimus Education ensures consistency by:

- Restricting program scope to foundational competencies appropriate for paraprofessional-level practice.
 - Designing learning activities that reflect technician-level responsibilities (e.g., data collection, reinforcement, basic intervention procedures).
 - Reviewing curriculum annually to confirm alignment with program purpose, scope, and target audience.
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6. Alignment of Learning Outcomes, Activities, and Assessments

Optimus Education ensures alignment by mapping each intended learning outcome directly to corresponding learning activities and summative assessments.

Example:

- **Learning Outcome:** “Define and identify positive reinforcement.”
- **Learning Activity:** Watch demonstration video, complete guided practice scenarios, role-play reinforcement delivery.
- **Summative Assessment:** Exam item requiring classification of reinforcement examples; applied task demonstrating reinforcement selection.

This alignment ensures that learners not only acquire knowledge but also demonstrate applied competency before certificate issuance.

7. Responsibilities

- **Program Director:** Oversees instructional design plan and approves all curriculum updates.
 - **Subject Matter Experts (SMEs):** Develop and review instructional content and ensure alignment with outcomes and assessments.
 - **BTEC Council:** Provides stakeholder input and ensures program consistency with purpose and scope.
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8. Continuous Improvement

The instructional design plan is reviewed annually as part of Optimus Education’s management review process. Updates are documented in program records, ensuring transparency and continuous improvement of instructional quality.

III. CERTIFICATE ISSUANCE AND USE

(E2659-18 7.1., 7.1.1, 7.1.1.1, 7.1.1.2, 7.1.1.3, 7.1.1.4, 7.1.1.5)

3A. POLICY: Optimus Education (formerly Innovative Learning) is the only institution with the authority to issue Behavior Technician Level One certificates. The individuals within the organization with authority to issue certificates are the Director of Operations, Director of Programs, or Course Instructor.

3B. PURPOSE: The purpose of this policy is to ensure that Optimus Education issues certificates in a responsible manner and informs certificate holders and primary stakeholders about the proper use and interpretation of the certificate. It will be made clear that the certificate is a record of coursework completed and is not equivalent to a certification or credential. A certificate shall be issued to all certificate holders.

3C. PROCEDURE

The certificate issuance is based upon the completion of coursework and instructor exercises. Because the coursework is completely online, the learner receives immediate documentation of his/her progress. The instructors have up to one week to grade instructor exercises. The instructor either passes the learner immediately or provides feedback and asks the learner to re-submit the answer.

The date of certificate issuance is the date that all of the requisite portions of the program are completed.

The term of validity for an individual's certificate is three years. As the certificate is proof of completion of the coursework, the certificate expires three years from the date of issuance.

The certificate shall be issued after all requisites for the certificate are fulfilled by learners and verified by the certificate issuer. Certificates are issued to learners who fulfill the program requirements satisfactorily:

Eligibility Requirements:

- Must be at least 18 yrs old
- Must have a minimum of an HS Diploma or equivalent

Program Completion Requirements:

- Payment of Tuition
- Recommendation by immediate supervisor (professor, teacher, mentor, work supervisor)

- Completion of the 45-hour course, instructional supports, and probes at 90% criteria pass rate
- Complete 4 instructor-led exercises overseen by a BCBA-D
- Verification of a minimum of 15 hours of “on the job” training and demonstration of skills by a licensed or board-certified supervisor.
- Pass a standardized psychometrically sound final assessment. Cut Score: 72.78 % (passing score)
- Complete online survey for continued quality assurance and management
- Agree to terms and conditions (Code of Ethics, Supervision Requirements, Role of a BTL1)
- Agree to the inclusion on a public registry as a source of primary source verification for third parties

Once all of these requirements are met, the certificate is unlocked and made available to the learner within five business days.

The decision to issue a certificate shall be made by the certificate issuer based solely on the information gathered during the certificate program process.

The certificate will be issued to the individual who completed the program requirements and shall be non-transferable.

The certificate issued shall be signed or otherwise authorized by an authority designated by the certificate issuer and shall include, as a minimum, the following information:

- a. Name of the certificate holder;
- b. Title and scope of the certificate program;
- c. Name of the certificate issuer;
- d. Designation and associated acronym granted, if applicable; and
- e. Certificate issue date and term of validity. Because changes to the human services field may occur, the certificate’s term of validity is three years. After three years, in order to remain current on changes in the field, certificate holders may apply to re-validate their certificate after proving they have learned the updated content necessary.
- f. A unique identifier number

Certificate holders will receive a certificate of completion along with instructions stating that:

Inferences about Certificate Holders. COMPLETION OF THE BTL1 CERTIFICATE PROGRAM DOES NOT SIGNIFY THAT A PERSON IS CERTIFIED, LICENSED, ACCREDITED, OR REGISTERED TO WORK INDEPENDENTLY AS A BEHAVIOR TECHNICIAN. Individuals who have completed the BTL1 program must work under a qualified supervisor. Completion of this course signifies that the certificate holder has met the intended learning outcomes. The course can be used as the training coursework portion for BCAT, RBT, and ABAT certifications, but the full certification process must be followed in order to qualify for those particular certifications. In some cases, the certificate holder may be able to work for billable hours under some insurance providers. However, all work must be under a qualified supervisor and with the approval of their employer. CERTIFICATES ARE NOT TRANSFERABLE.

Optimus Education will document, manage, and communicate to primary stakeholders the conditions for use of the certificate issued and any associated designations, designation acronyms, or other marks or logos. A database of certificate holders, the date of the certificate, and the certificate number will be maintained by Optimus Education on the Optimus Education website.

A certificate holder who completes the Level One program will be designated as a Certificate Holder in Behavior Technician Level One or “BTL1.”

Any inappropriate usage of the certificate or its corresponding designation, acronym, marks, or logos will be addressed by:

1. asking the student to cease and desist.
2. If necessary, the learner’s supervisor will be notified about the inappropriate use.

IV. INVALIDATING A CERTIFICATE

(E2659-18 7.1.1.5)

(updated December 2018)

4A. POLICY: The Behavior Tech Level One program is a certificate program for which learners earn a certificate upon completion. The BTEC Council will delineate the situations under which certificates can be invalidated, situations under which certificates can expire, and how to revalidate expired certificates.

4B. PURPOSE: The purpose of this policy is for Optimus Education to outline the process where a certificate can be invalidated. A certificate will be invalidated only if the person it was issued to is found to have not fulfilled the certificate program requisites or the certificate's term of validity expires.

Examples of circumstances that might lead to the certificate issuer's invalidation of a certificate include a learner's falsification or misrepresentation of identity or information to the certificate issuer or participation in activities that provided an unfair advantage in meeting the certificate program's requirements.

4C. PROCEDURE

Invalidation occurs when it has been discovered that:

- a. the certificate should not have been issued in the first place, or
- b. The certificate's term of validity has expired.

This is distinguished from revocation, which is the removal of a credential (such as a certification or licensure) when the ongoing requirements of the program are not met. Since certificate programs do not have ongoing requirements, **the certificate issued here is never revoked, but may be invalidated.**

Expired Certificates The term of validity for certificates is three years. If certificate holders do nothing, after three years, their certificate status is invalidated and marked as "expired" on the BTL1 registry.

Revalidating Expired Certificates Certificate holders have the option to revalidate their certificate. When the expiration date is approaching, certificate holders have the option to "revalidate" their certificate by paying a fee, completing a revised version of the BTL1 course to prove continued competency, and re-verifying supervision. Once these requirements have been

met, a learner passes revalidation, and their status is marked as “active” on the BTL1 registry for another three years.

V. COMPLAINTS

(E2659-18 5.8, 5.8.1, 5.8.2, 5.8.3, 5.8.4)

5A. POLICY: Optimus Education wishes to provide an effective and positive web-based learning environment with respect and responsibility to each other.

The process for complaints shall:

- 5A(i). Be readily accessible by primary stakeholders (5.8.1);
- 5A(ii). Ensure that those engaged in the complaint resolution are different from those involved in the issue of the complaint (5.8.2);
- 5A(iii). Ensure that the complainant is informed in a timely manner of the outcome of the complaint (5.8.3); and
- 5A(iv). Include a mechanism to track and record complaints, including actions taken in response to them (5.8.4).

5B. PURPOSE: The purpose of this policy is to establish a process that web-based learners can use for unresolved issues, for corrective action when inappropriate conduct or activity occurs, as well as to appeal these issues or actions

5C. PROCEDURE

5C(i). A form to submit complaints and the process for complaints is posted on both the bteccouncil.com and Optimus Education websites (5.8.1).

5C(ii). No staff member involved in the complaint will be involved in the resolution of the complaint (5.8.2).

5C(iii). Process for Handling of Complaints:

1. Initial Complaint:
 - a. Complainant to submit in writing the complaint on the form provided on the website or directly to contact@optimus.education, or the Director of Programs cbaham@Optimus.Education.
 - b. A staff (management) member will respond within seven (7) business days acknowledging acceptance of the complaint.

- c. No staff member involved in the complaint will be involved in the resolution of the complaint (5.8.2).
- d. For complaints about refunds, please refer to the Refund and Cancellation policy for appropriate steps,
- e. Auto-response generated to the complainant, including acknowledgment of complaint and information about the timelines for resolution
- f. Complainants are informed that if they do not receive a sufficient response to their written complaint within 30 days of providing it to our Director of Programs, then the complainant can contact the Director of Operations at ymoellerus@gmail.com

2. Handling of Complaint

- a. Reviewed by management staff and assigned as appropriate to another management staff member if one is named in the complaint.
- b. Gathering of information through “fact-finding,” including an interview with the complainant, request for information from all parties named in the complaint as needed, review of student records and BTL1 enrollment, completion history, information gathering from employer (if applicable),
- c. Draw conclusions and document the response in a complaint tracking spreadsheet

3. Maintaining Impartiality

- a. Upon review of the complaint, any commercial, financial, or other pressures which may compromise the impartiality or resolution of the complaint will be noted
- b. Any investigation into a complaint will be done with the confidentiality of the complainant maintained as appropriate, especially if a management staff is included in the complaint.
- c. Training and awareness of impartiality will be part of the management review process
 - i. Training and awareness on an annual basis will include the definition of impartiality and situations which may increase the risk of impartiality.

- ii. Review of complaints during formal BTEC Council meetings (if the complaint is within the purview of the BTEC Council) will always include a statement of impartiality and identification of and/or management of risks on an ongoing basis.

4. Resolution of Complaint

- a. Complaint resolution should be communicated to the learner within thirty (30) days of receipt (5.8.3).
- b. A spreadsheet to track complaints will be maintained by BTL1 management and staff (5.8.4).

VI. APPEALS

(E2659-18 5.9, 5.9.1, 5.9.2, 5.9.3, 5.9.4)

6A. POLICY: The process for appeals shall:

6A(i) Be readily accessible by primary stakeholders (5.9.1).

6B. PURPOSE: The purpose of this policy is to establish a process that web-based learners can use to request a reconsideration of an adverse decision made by the certificate issuer related to the certificate program. This process is to give them an avenue to appeal these issues or actions.

6C. PROCEDURE

6C(i). A place to submit a written appeal and the process for appeals is posted on both bteccouncil.com and Optimus.Education websites (5.9.1).

6C(ii). No staff member involved in the original complaint and/or its appeal will be involved in the resolution of the appeal (5.9.2).

6C(ii)a. Once the appeal has been received, and the appellant notified of its receipt, the Director of Programs determines who will investigate the appeal in order to ensure that nobody named in the appeal is involved in its resolution.

6C(ii)b. If the appeal involves the Director of Programs, the Director of Operations will oversee the appeal process. If both of them are named, the appeal will be handled by either a staff member or the BTEC Council, if necessary.

6C(ii)c. Maintaining Impartiality

1. Upon review of the appeal, any commercial, financial, or other pressures which may compromise the impartiality or resolution of the appeal will be noted especially if new information is submitted with the appeal.
2. Any review of the appeal will be done with the confidentiality of the complainant maintained as appropriate, especially if management or staff is included in the complaint and appeal.
3. Training and awareness of impartiality will be part of the management review process.
4. Training and awareness on an annual basis will include the definition of impartiality and situations which may increase the risk of impartiality.

6C(iii). Timeline. If a learner would like to appeal a decision, the appeal must be submitted in writing either on the form provided on the website or directly to contact@Optimus.Education. A staff member will respond within seven (7) business days acknowledging acceptance of the appeal (5.9.3).

- a. Management will review any new information provided by the appellant. New information may include email correspondence, screenshots, dates, and time of phone call(s).
- b. Appeals must be received within 3 months of the determination that the learner wishes to appeal.
- c. Resolution should be communicated to the learner within thirty (30) days of receipt.
- d. Outcomes of appeals are final

6C(iv). A tracking document for appeals will be utilized and maintained by BTL1 management and staff (5.9.4).

VII. PRIVACY, CONFIDENTIALITY, AND SECURITY

(Updated January 2018)

7.1 PRIVACY

7.1A. **POLICY** Optimus Education is committed to ensuring that privacy is protected. Should applicants, candidates, and certificate completers be asked to provide certain information by which applicants, candidates, and certificate completers can be identified when using this website, applicants, candidates, and certificate completers can be assured that it will only be used in accordance with this privacy statement.

Privacy Statement: This privacy policy sets out how Optimus Education uses and protects any information that you give when you use this website.

Optimus Education is committed to ensuring that learners' privacy is protected. Should Optimus Education ask a learner to provide certain information by which they can be identified when using their website, then learners can be assured that it will only be used in accordance with this privacy policy.

Optimus Education may change this policy from time to time. Updates can be found in the Policies and Procedures or on the Optimus Education website.

7.1B. **PURPOSE:** The purpose of this policy is to define how Optimus Education and the BTEC Council uses and protects any information provided by applicants, candidates, and certificate completers.

7.1C. PROCEDURE:

What we collect

We may collect the following information: name and job title; contact information including email address; demographic information such as postcode, preferences, and interests; and/or other information relevant to customer surveys and/or offers

What we do with the information we gather

We require this information to understand your needs and provide you with a better service and in particular for the following reasons:

We are required by various accrediting bodies to provide particular information in order for users' completion of courses and programs to be recognized for approval by that body.

Internal record keeping.

We may use the information to improve our products and services.

We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.

From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail.

We may use the information to customize the website according to your interests.

We may provide your information to our third-party partners for marketing or promotional purposes.

We will never sell your information.

What we collect and/or maintain that remains confidential (see Candidate Data Confidentiality section): social security numbers, transcripts, application status, and examination results.

7.2 CANDIDATE CONFIDENTIALITY

7.2A. POLICY: The company philosophy is to safeguard candidate information in its possession to ensure the confidentiality of the information.

7.2B PURPOSE: the company will only collect and maintain personal candidate data that is required to pursue its business operations and to comply with government reporting and disclosure requirements.

7.2C PROCEDURE: Personal information collected and maintained by the company not limited to but including candidate names, job title, addresses, telephone numbers, e-mail addresses, social security numbers, transcripts, disciplinary action, application status, and examination results.

As stated in the Privacy statement, name, address, telephone number and e-mail address, and other demographic information may be shared. Please refer to that statement for more details. All information is maintained in a locked, segregated area or online on a secured website.

Candidate information will be considered confidential and, as such, will be shared only as required and with those who have a need to have access to such information. All hard copy records will be maintained in locked, secure areas with access limited to those who have a need for such access.

Candidate information used in business system applications will be safeguarded under company proprietary electronic transmission, intranet policies, and security systems. This requirement applies to all employees: regular or temporary, and contractors/consultants of the Company. Be aware that employees are expressly prohibited from transmitting, copying, distributing, or in any other way using this customer data outside of the Company's secured systems or for any purpose other than the Company's business. Employees who are aware of the existence of personally identifiable information residing outside of Optimus Education, LLC's secured systems must inform their manager immediately so that the information may be appropriately stored. No activity may be conducted, nor any technology employed that might obstruct compliance with any portion of this policy.

7.3 SECURITY

7.3A. POLICY: Optimus Education is committed to ensuring that learner information is secure.

7.3B PURPOSE: The purpose of this policy is to ensure Optimus Education has put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information collected online in order to prevent unauthorized access or disclosure.

7.3C PROCEDURE

How we use cookies

A cookie is a small file that asks permission to be placed on your computer's hard drive. Once you agree, the file is added, and the cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps us analyze data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes, and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

Links to other websites

Our website may contain links to enable you to visit other websites of interest easily. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites, and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Controlling your personal information

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law. We may use your personal information to send you promotional information about third parties, which we think you may find interesting if you tell us that you wish this to happen.

You may request details of personal information which we hold about you at any time. If you would like a copy of the information held on you, please write to support@optimus.education.

If you believe that any information we are holding on you is incorrect or incomplete, please write to or email us as soon as possible at the above address. We will promptly correct any information found to be incorrect

Employee Guidelines

All employees, contractors, and consultants using customer personal information obtained from Optimus Education are required to adhere to the following guidelines:

- Provide confidential data, such as the release of transcripts, certificate status, etc. as outlined in the policy only to the candidate, dean of the college involved, legal authorities
- Place printed documents and other materials containing personally identifiable information in a locked room or cabinet.

- Log off computers when out of the office and at the end of the day.
- Ensure file cabinets and office doors are locked at the end of the day.
- Encrypt confidential data if it must be e-mailed or in any way sent over public networks.
- Keep passwords private; do not share this information with others.
- Share customer personal information only with those who have a legitimate business need.
- Dispose of paper records by shredding them.
- Notify management immediately if a security breach is suspected.
- Immediately disconnect any computer from the Internet that may have been compromised.

VIII. PROGRAM COMMERCIAL SUPPORT AND DISCLOSURE

(E2659 5.6.3)

(updated December 2018)

8A. POLICY: In the case in which commercial support is received in whole or in part for the certificate program, the responsibility for assurance of quality and conformance with this practice rests with the certificate issuer (5.6.3).

8B. PURPOSE: The purpose of this policy is to ensure that when commercial support is received, there shall be no undue influence created because of this financial support.

8C. PROCEDURE

Selection of personnel accountable for control of content

Optimus Education is responsible for the selection of all persons and organizations that will be in a position to control the content of all programs. Additionally, appropriate Optimus Education personnel (as selected by Optimus Education's Director of Operations) make all decisions regarding the disposition and disbursement of commercial support.

Independence in the use of gift funds

Optimus Education makes all decisions regarding the disposition and disbursement of the gift provided by the Commercial Supporter pursuant to this Agreement.

The Commercial Supporter cannot require Optimus Education to accept advice or services concerning instructors, developers, participants or other program matters, including content, as a condition of receiving this gift.

All other support from the Commercial Supporter associated with this awareness program (e.g., distributing brochures, preparing slides) can only be provided with the full knowledge and written approval of the Director of Operations of Optimus Education.

No funds from the Commercial Supporter will be paid by the Commercial Supporter to the executive board, management staff, employees, vendors or other parties involved with the Optimus Education certificate programs.

Optimus Education will, on written request from the Commercial Supporter, furnish the Commercial Supporter with documentation detailing the receipt and expenditure of the gift.

Promotional Activities

Product promotion or product-specific advertisement of any type is prohibited in or during the certificate programs. Promotional activities must be kept separate from the certificate program activity. Promotional materials cannot be displayed or distributed in the program space immediately before, during or after the certificate program. The juxtaposition of editorial and advertising material on the same products or subjects is not allowed.

Disclosure

Optimus Education ensures that the support from the Commercial Supporter is disclosed to the participants in program brochures or other program materials and at the time of the activity. The disclosure does not include the use of a trade name or a product-group message. The acknowledgment of commercial support may state the name, mission, and involvement of the Commercial Supporter and may include corporate logos and slogans, as long as the logo or slogan does not promote a product of the Commercial Supporter.

All program planners, instructional personnel, or anyone supplying external financial support must fill out the “Program Planner / Instructional Personnel / Commercial Relationship Disclosure Form” found in Appendix A of the Policies and Procedures Manual.

IX. FEES, CANCELLATIONS, AND REFUNDS

9.1 FEES (updated December 2019)

9.1A. POLICY: Optimus Education will have clear guidelines and processes around establishing fees.

9.1B. PURPOSE: The purpose of this policy and procedure is to ensure that all fees charged to a Behavior Technician applicant and/or an agency is implemented to ensure fairness and impartiality in regard to certificate program costs, certificate orders, and final exam retakes.

9.1C. PROCEDURE

Course Fees. The cost of the Behavior Technician Level One program shall be the price published on the website, currently \$165 per person. Any change in price must be agreed upon by Optimus Education management and the BTEC Council.

University Credit Fees. University credits are not currently available at this time. Should graduate-level professional development credit hours become available through a partner university, the procedure required by the partner university shall be followed. All fees must be paid directly to the partner. Course and Program numbers will be available on the website along with the registration form that is submitted directly to the partner school.

Final Exam Retakes. Currently, there is no charge for final exam retakes. Any change in the price of exam retakes must be agreed upon by Optimus Education's management and the BTEC Council.

Expenses and Payment Procedures

Currently, Optimus Education is not approved for Title 4 Funding therefore, financial aid is not an option for our courses or programs. If Optimus Education ever becomes a fully accredited college and is approved for Title 4 funding, then we will post this information in our handbook and on our website, Optimus.Education.

The tuition that is published on the website is inclusive of all registration, processing, and miscellaneous fees.

Occasionally Optimus Education will work with the candidate to establish a payment plan based on instances of financial hardship. Optimus Education LLC reserves the right to review these situations on a case-by-case basis. In some cases, access to the course or program may be restricted until all tuition is paid in full.

Tuition is paid online through our merchant PayPal. All major credit cards are accepted. Optimus Education LLC does not have access to your payment information or, in any way, have the ability to store your payment information.

9.2 REFUND AND CANCELLATION POLICY *(updated October 2017)*

9.2A. POLICY: Optimus Education will have clear guidelines and processes around cancellations and providing refunds.

9.2B. PURPOSE: The purpose of this refund and cancellation policy is to ensure fairness and impartiality in regard to decisions regarding refunds in various situations. The goal is to protect the consumer/purchaser of courses and certificate programs as well as the interest of the company in an ethical process. This policy will be communicated clearly at the beginning of each course or certificate program, and a participant must agree to the terms and conditions. Appeal and complaints will follow the written and published appeal and complaints process.

9.2C PROCEDURE

This Refund and Cancellation Policy is subject to change at any time. The published version at the time of the request will be the version used to determine a student's refund eligibility.

Requests for refunds must be made in writing and can be submitted to: info@Optimus.Education. Requests must include the name provided at time of enrollment, a detailed account giving the reason the student wishes to withdraw, and why the student feels a refund should be issued.

The basis upon which refunds are considered:

a. ADMIN FEE: An administration fee of 10% of the full, undiscounted program cost, will apply to all refunds. There are no exceptions.

b. REFUND PERIOD:

i. If a student has enrolled in a course but has not entered the course, and the period between enrollment and notification of withdrawal does not exceed 30 days from the enrollment date, a refund will be issued for the full amount of the course fee, less the Admin Fee.

ii. If a student has entered the course (or series of courses), completed any amount of coursework, and the period between enrollment and notification of withdrawal does not exceed 30 days from the enrollment date, any refund due will be calculated

based on the percentage of the course completed as of the last date of activity on the Learning Management System (LMS). This will only apply up to the point of 50% of the coursework being completed.

iii. After fifty percent (50%) of coursework has been completed, irrespective of the amount of time passed, THE COMPANY'S obligation is considered complete, and it may retain the full tuition.

c. SPECIAL PAYMENT TYPES:

i. COURSE SERIES: If a series of courses, or a specific program, is paid for in advance, whether at full tuition, at a discounted tuition, or as part of a promotion, refund requests are accepted for consideration within 30 days of the date upon which tuition, or any part of tuition, is received by THE COMPANY.

ii. PAYMENT PLANS: If tuition is being paid via a PAYMENT PLAN, then enrollment in all courses covered by the payment plan is subject to the same terms as if tuition is paid for in full and in advance. For these purposes, Tuition is considered to have been received by THE COMPANY upon signing of the payment plan agreement. Last Revision Date: July 2017

d. AFTER THE 30-DAY REFUND PERIOD:

i. If the period between enrollment and notification of withdrawal exceeds 30 days from the enrollment date, whether coursework has been started or not, an application for refund may still be submitted up until 90 days from the enrollment date. However, THE COMPANY is under NO obligation to refund the tuition. Consideration will be given to the refund request, and the student will be notified within 30 days from the request for refund submission date as to the success of the application. Once a decision has been made, and the student notified, all decisions are final, and THE COMPANY will not enter into further discussion.

ii. In cases of course series or program series paid for in advance, the maximum refund given after the 30 refund period will be 50% of any courses not entered. However, there is no refund guaranteed in this case.

iii. Under the terms of having entered into a PAYMENT PLAN agreement, all decisions regarding refunds or forgiving of agreed payments are at the sole discretion of THE COMPANY, and decisions regarding such are final, and discussion will not be entered into.

e. FINAL DATE FOR REFUNDS:

i. There will be no refunds granted on any course or series of courses or examinations at any time following 90 days from the enrollment date.

f. REFUND TIME FRAMES:

i. Once a request is submitted, THE COMPANY has up to 30 days from the date the request is received to determine if a refund will be issued and the amount that will be refunded.

ii. The Date of Determination is the date upon which the student receives notice of the outcome of the refund request.

iii. Refunds will typically be paid within forty-five (45) calendar days of the Date of Determination.

g. WHO WILL RECEIVE THE REFUND:

i. Any refund paid by THE COMPANY will only be issued to the party who made payment to THE COMPANY, even if payment was made on behalf of the student.

h. CIRCUMSTANCES WHERE REFUNDS WILL NOT BE ISSUED:

i. TECHNICAL ISSUES: Refunds are not available for students who have experienced technical issues. Although we work hard to do everything possible to avoid issues, many aspects of the technology fall outside of our control, such as hosting and server functionality.

ii. FAILURE TO USE COUPON CODES: Refunds will not be available for failure by users to use coupon codes. Students who either forget to enter a coupon code, or receive said coupon code after the course has been paid for, are no longer eligible for the discount related to that code.

iii. UNAUTHORIZED CODE USE: Refunds will not be given to anyone who utilizes a coupon code not belonging to them, their employer, or without exclusive permission from THE COMPANY.

i. DUPLICATE PAYMENTS:

i. If an employer contacts us and pays for a course for a student, either in part or in full, a coupon code will be issued to the employer to give to the student. Said

coupon code will allow the student entry into the course at either no cost or at a reduced cost, depending on how much was paid by the employer. If the student enters the course, neglects to enter the coupon code, and pays full price for the course, there is no refund available to either party. If the employer does not receive the code, or in error, does not give it to the student for use, and the student pays for the course in full, THE COMPANY will grant credit to the employer for the amount that was overpaid, which can be applied towards another seat in any course in its catalog. The issue of duplicate payment is then between the student and their employer, and THE COMPANY will not be involved. Last Revision Date: July 2017

j. INDEPENDENT FIELDWORK:

i. Because we must contract with a fieldwork provider for this type of program, we cannot refund any fees paid for Independent Fieldwork courses under any circumstances. This includes, but is not limited to, BCBA Accelerated Independent Fieldwork, Supervision, and Practicums.

CANCELLATIONS:

1. Eligibility: Some courses and programs require a student to agree that they meet predefined eligibility criteria to gain entry. Should a student agree to said terms, but it is subsequently found that, for any reason, eligibility criteria cannot be verified (see sections 7 & 8), then the student will be informed, and the enrollment will be canceled.
2. Recommendations and Fieldwork Verification: Some courses and programs require a student to receive Recommendations and Fieldwork Verification from people who are in supervisory positions of the student. Recommendations may verify that the student meets certain predefined standards considered preferable for people wanting to complete the course or program. Fieldwork Verification requires that the person can verify the student meets certain predefined practical experience related to the study topic.
3. A student can begin coursework prior to Recommendations and Fieldwork Verification being complete. Should recommendations and verification of fieldwork subsequently be unable to be verified, then the enrollment may be canceled.
4. If a student's enrollment is canceled and they have completed less than 50% of the coursework, a \$200 fee will apply and will be deducted from a refund due. Where the course or program cost is less than \$200, then no refund will be made. If

a student's enrollment is canceled and they have completed 50% or more of the coursework, there is no refund available. Exceptions and variations to this fee are entirely at the discretion of THE COMPANY and will be determined on a case-by-case basis.

9.3 EXTENSIONS AND DROPS

9.3A POLICY: Optimus Education will have clear guidelines and processes around establishing extensions and drops. .

9.3B. PURPOSE: The purpose of this policy and procedure is to ensure fairness and impartiality in regard to providing course extensions and drops.

9.3C PROCEDURE

Candidates who are not able to finish the program within the initial time period may request an extension. The time period to finish a program or course varies depending on the classroom equivalency hours. Typically a candidate has 6 months (180 days) to finish a 45-hour course.

If a candidate is unable to finish the course or program, the candidate will be asked to complete a "Request for Extension," which will include the participant's plan for completion of the program. This form can be found on the website.

The criteria for granting an extension:

1. Personal or family illness
2. Maternity leave or family leave
3. Death in the family
4. Relocation due to job transfer or company consolidation or downsizing
5. Financial distress due to job loss

Each request will be evaluated on a case-by-case basis, and Optimus Education management will make every effort to support the candidates with advice and assistance.

X. NONDISCRIMINATION

(Updated 8/31/16, 1/20/20)

10.1 NONDISCRIMINATION

10.1A. POLICY: It is the policy of Optimus Education to maintain an online learning environment free of all forms of unlawful discrimination.

10.1B. PURPOSE: The purpose of this policy is to ensure that Optimus Education and its subcontractors will not unlawfully discriminate, harass, or allow harassment against learners/course participants, employees, or applicants on the basis of race, color, ancestry, gender (including gender identity and gender expression), religion, creed, age, marital status, registered domestic partner status, disability (including HIV and AIDS), medical conditions, socioeconomic or ethnic background, sexual orientation, genetic information, veteran status or national origin, or any other characteristic protected by applicable statute. The discrimination precluded by this policy includes any discrimination against an individual because that individual is perceived to have any of the foregoing characteristics or is associated with a person who has or is perceived to have any of the foregoing characteristics.

10.1C PROCEDURE

Optimus Education will only gather the personal information necessary to process payment for the online courses and register the participants in the purchased online courses.

In the event Optimus Education provides face-to-face training, all course instructors will demonstrate a high standard of professional conduct and will not discriminate against course participants, and will abide by all of the above non-discrimination practices.

All instructors will be required to sign and date a non-discrimination policy prior to providing training as evidence that they are aware of this policy. The original signed form will be maintained in the instructor's personnel file located in Optimus Education's Central office in Buellton, California.

Any learner or participant who believes that he or she has been discriminated against unlawfully should bring any complaint to the Director of Operations or the Director of Programs. Complaints may be lodged in writing or in person. Persons who file complaints will be advised, as is appropriate, regarding any investigation, action, or resolution of the problem. Please see the Complaints Policy for details.

No Retaliation

The Company will not retaliate nor discriminate against any employee or learner because he or she has opposed any unlawful employment practice or filed a charge of employment discrimination, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing related to employment and educational governance practices.

10.2 COMPLIANCE WITH THE AMERICANS WITH DISABILITIES ACT

10.2A POLICY: The policy of Optimus Education is to comply with the Americans with Disabilities Act.

10.2B PURPOSE: The purpose of this policy is to ensure that Optimus Education students and employees are offered reasonable accommodations to enable them to comfortably perform the duties of their job or to complete coursework without undue strain

10.2C PROCEDURE

To accommodate disabilities, Optimus Education has ensured that the latest technology is embedded in the LMS and available to our course participants, including text to speech features and zoom capabilities. When requested, all other forms of reasonable accommodations will be made for both students and employees of Optimus Education.

The Company will not tolerate any form of discrimination and will take appropriate disciplinary action, including possible termination, of any person determined to have engaged in unlawful conduct under this policy.

XI. PERSONNEL

(E2659-18 5.3., 5.3.1, 5.3.2, 5.3.3, 5.3.4, 5.3.5, 5.3.6) –

updated January 20, 2020

11A POLICY:

- 11A(i) Optimus Education will ensure personnel will be assigned to implement the certificate program policies (and procedures, where applicable) (5.3.1).
- 11A(ii) Optimus Education shall communicate current policies (and procedures, where applicable) to relevant personnel and provide training as needed. (5.3.2)
- 11A(iii) Optimus Education shall have sufficient personnel to conduct the certificate program activities properly. (5.3.3)
- 11A(iv) Optimus Education shall define the qualifications for personnel involved in certificate program activities. (5.3.4)
- 11A(v) Personnel shall be qualified for their assigned roles on the basis of appropriate education, training, or experience, or combination thereof. (5.3.5)
- 11A(vi) Optimus Education shall evaluate on an ongoing basis the qualifications of personnel to perform assigned roles. Training and development plans shall be implemented where deficiencies are found. (5.3.6)

11B PURPOSE: The purpose of this policy is to communicate the roles and responsibilities of the personnel responsible for implementing the certificate program in its entirety.

11C PROCEDURE

- 11C(i) The Director of Programs and, when applicable, the Director of Operations of Optimus Education are assigned to implement the certificate program policies (and procedures, where applicable). (5.3.1)

11c(ii) The Director of Programs will communicate current policies and procedures through email yearly, or as changes happen, to relevant personnel, and provide training as needed. (5.3.2)

11C(iii) At a minimum, the BTL1 program should have a Program Director, IT desk, and instructor to conduct the certificate program activities properly. (5.3.3)

11c(iv) Qualifications for the personnel involved in the BTL1 certificate program activities can be found in the job descriptions. (5.3.4)

11C(v) Personnel shall be qualified for their assigned roles on the basis of appropriate education, training, experience, or combination thereof. (5.3.5)

11C(vi) Optimus Education shall evaluate yearly the qualifications of personnel to perform assigned roles as part of their program and personnel evaluations. Training and development plans shall be implemented where deficiencies are found. (5.3.6)

XII. OUTSOURCING

(E2659 5.6, 5.6.1, 5.6.1.1, 5.6.1.2, 5.6.1.3, 5.6.2)

12A POLICY: Optimus Education will ensure that any outsourcing in carrying out one or more of the Certificate program activities is clearly defined.

12B PURPOSE: The purpose of this policy is to ensure all management and oversight remains with the Certificate Issuer, Optimus Education.

12C PROCEDURE:

12C(i) Optimus Education management is responsible for monitoring any contractors carrying out one or more of the BTL1 program activities for assurance of quality and conformance with these standards. (5.6.1)

12C(ii) Optimus Education shall have current contracts or agreements with contractors that clearly specify the responsibilities assigned and include provisions to ensure confidentiality and prevent conflicts of interest. (5.6.1.1).

1. The vetting process prior to contract offer includes
 - a. Verification of credentials (including applicable licensure or certifications) through credentialing or state boards
 - b. An Internet search of any controversial information
 - c. interview
 - d. CV
 - e. At least two work references
2. All contracts will include a conflict of interest statement as outlined in the Optimus Education Policy and procedure for conflicts of interest which include:
 - a. Revealing confidential information to outsiders or misusing confidential information. Unauthorized divulging of information is a violation of this policy whether or not for personal gain and whether or not harm to the Company is intended. (The Employment, Confidential Information, Invention Assignment, and Arbitration Agreement elaborates on this principle and is a binding agreement.)
 - b. Accepting or offering substantial gifts, excessive entertainment, favors, or payments which may be deemed to constitute undue influence or otherwise be improper or embarrassing to the Company.
 - c. Participating in civic or professional organizations that might involve divulging confidential information about the Company.

- d. Initiating or approving personnel actions affecting reward or punishment of employees or applicants where there is a family relationship or is or appears to be a personal or social involvement.
- e. Initiating or approving any form of personal or social harassment of employees.
- f. Investing or holding outside directorship in suppliers, customers, or competing companies, including financial speculations, where such investment or directorship might influence in any manner a decision or course of action of the Company.
- g. Borrowing from or lending to employees, customers, or suppliers.
- h. Acquiring real estate of interest to the Company.
- i. Improperly using or disclosing to the Company any proprietary information or trade secrets of any former or concurrent employer or other person or entity with whom obligations of confidentiality exist.
- j. Unlawfully discussing prices, costs, customers, sales, or markets with competing companies or their employees.
- k. Making any unlawful agreement with distributors with respect to prices. 12. Improperly using or authorizing the use of any inventions which are the subject of patent claims of any other person or entity.
- l. Engaging in any conduct which is not in the best interest of the Company. Each officer, employee, and independent contractor must take every necessary action to ensure compliance with these guidelines and to bring problem areas to the attention of higher management for review. Violations of this conflict of interest policy may result in discharge without warning.

12C(iii) Optimus Education management shall ensure each contractor is qualified to carry out the responsibilities assigned. (5.6.1.2)

1. During the screening and vetting process, verification of credentials (including applicable licensure or certifications) through credentialing or state boards will be conducted

12C(iv) Optimus Education will monitor the performance of contractors in carrying out assigned responsibilities yearly in accordance with documented policies (and procedures, where applicable) and in compliance with the provisions of this practice. Renewal of contracts will be seen as approval of the past year's performance. (5.6.1.2)

1. All contracts will include a statement of work
2. As of 6/1/22 the statement of work of all new contractors will be measurable based on permanent products. Statements of work will be performance-based with target dates and measurable outcome standards identified upon contract signing.
3. All annual renewals post 6/1/22 will have clear concise performance-based expectations or statements of work.

4. Performance targets will be reviewed at a minimum on a quarterly basis and revised as necessary.
5. On annual renewal the statement of work and permanent products will be reviewed and noted on renewal

12C(v) Authority to issue certificates: Optimus Education is the only institution with authority to issue Behavior Technician Level One certificates. The individuals within the organization with authority to issue certificates are the Director of Operations, Director of Programs, or Course Instructor.(5.6.2)

XIII. Records Control Policy & Procedure

(Aligned with ANSI/ASTM E2659-24 Standards)

1. Policy Statement

Optimus Education management shall maintain a comprehensive records control system to ensure that learner and certificate records are created, maintained, secured, and disposed of in compliance with applicable laws, contractual obligations, and accreditation standards. This system shall specify **what records are kept, by whom, for how long, and how they are disposed of**.

All records must be **accurate, complete, secure, and accessible** only to authorized personnel. The records control process supports verification of learner progress, completion status, earned academic or continuing education credits (if applicable), certificate issue date, and certificate validity period.

2. Purpose

The purpose of this policy is to:

- Provide clear requirements for the creation, access, storage, retention, and disposal of learner and certificate records.
 - Ensure timely and accurate documentation to enable learners, certificate holders, and authorized stakeholders to verify program completion, continuing education credits, and certificate status.
 - Protect the confidentiality, integrity, and availability of all Optimus Education records.
-

3. Scope

This policy applies to:

- All Optimus Education employees, contractors, and partners who handle learner or certificate records.
 - All formats of records, including digital, paper, audio, and video.
 - All systems used to store or process records, including the Tovuti LMS, Cognify, Obvibase, AWS-hosted databases, and secure on-site/off-site storage.
-

4. Definitions

- **Candidate Records** – Information on individuals enrolled in Optimus Education programs, including enrollment data, grades, certificates, and communications.
 - **Transcript** – Official record of educational progress and completion maintained in the candidate file.
 - **Registry** – A public and internal listing of all active and inactive certificate holders, maintained indefinitely.
 - **Personal Information** – Information that can identify an individual, such as name, address, contact details, and certificate number.
-

5. Roles & Responsibilities

5.1 Director of Programs & Chief Operations Officer (COO)

- Ultimate responsibility for compliance with records control requirements.
- Approves retention schedules and disposal methods.

5.2 Super Administrators (Tovuti LMS)

- Full system access; create accounts, manage course content, assign permissions, and oversee learner records.

5.3 Sales Administrators

- Access only to accounts and records for assigned clients or learners.

5.4 Mentors

- Access to assigned learner accounts, progress, and communication tools.

5.5 Customer (Organization) Administrators

- Access to learner records within their organization, with learner consent.

5.6 Learners

- Access to assigned courses for the duration of their enrollment or account validity.

6. Records Creation & Access

- **Access Restrictions** – Only authorized Optimus Education staff and BTL1 management may access learner and certificate records.
 - **Student Accounts** – Students retain indefinite access to their own records unless their account is employer-managed and deactivated. Certificates may be requested at any time, regardless of account status.
 - **Registry Access** – The Behavior Technician Registry is publicly accessible online 24/7 for verification of certificate status.
-

7. Record Types & Retention Periods

Record Type	Retention Period	Storage Method
Learner records (name, contact, enrollment, grades, certificates)	Permanent	Secure LMS database & cloud storage
Certificate registry entries (active & inactive)	Permanent	Obvibase registry
Continuing education credit documentation (if applicable)	Per issuing institution policy	As required by provider
Emails & online communications	5 years	Secure email server
Hard-copy records (legacy files)	Permanent unless otherwise required by law	Locked, secure storage

Note: It is a violation of this policy to destroy records before the end of their retention period.

8. Timely Access Requirements

Record / Action	Access Timeframe
Quiz results	Immediate via LMS
Final exam results	Immediate via LMS
Instructor-graded exercises	Within 3–5 business days
Certificate issuance	Within 5 business days of course completion
Registry update	By Friday 5:00 PM PT following course completion
Continuing education credit application	Per issuing institution's timeline

9. Security & Data Protection

Optimus Education Records

- All records are stored on AWS-hosted infrastructure with ISO 27001, SOC 1, and PCI Level 1 compliance.
- Heroku cloud database architecture provides redundancy, isolation, and secure access control.

- Multi-layer firewalls, penetration testing, and vulnerability assessments are conducted regularly.
- Physical access to data centers is strictly controlled and logged.

Tovuti Records

- For information on Tovuti's records control process, please refer to: <https://www.tovutilms.com/msa>.
- Specifically, refer to these sections:
 - 6.3 The Clients Owns its Data, 7.3 Protection of The Clients Data, and 11.4 Return of The Clients Data that all relate to your company data.
 - The most relevant policies that collectively describe Tovuti's approach to records control and data safety for student data in addition to the main agreement.
 - **Data Retention Policy:** This policy provides specific timeframes and guidelines for retaining various types of personal data. It outlines reasons for data retention, such as litigation, security incident investigation, and regulatory requirements. It specifies retention periods for different data classifications, including operational data (5 years), critical data (6 years), and confidential data (7 years). It also addresses the secure storage of encryption keys for retained encrypted data.
 - **Data Destruction Policy:** This policy details Tovuti's procedures for securely destroying data. It covers the secure disposal of computer hardware and storage media to prevent security breaches and unauthorized information disclosure. It specifies methods for destroying physical print media (e.g., shredding) and electronic media (e.g., overwriting magnetic media) based on data classification levels.
 - **Information Management and Retention:** This section provides a comprehensive overview of how information, including confidential training materials and records, is handled and stored within the system, and how system output is managed. It covers aspects like data encryption, role-based access controls, data classification (including PII and PHI), secure logging, data masking and anonymization, data backup and recovery, audit trails, and compliance monitoring.
 - **Media Protection Policy & Procedures:** This dedicated document outlines how Tovuti protects media (physical and digital). It includes procedures for media storage (securely storing digital and non-digital media), media transport (protecting media during transportation), and media sanitization (sanitizing digital media before disposal or reuse).

10. Disposal of Records

When retention periods expire and records are not deemed archival:

- **Non-personal records** – May be recycled or securely deleted.
 - **Personal records** – Must be destroyed in compliance with California’s Disposal of Personal Records Law via shredding, secure erasure, or other irreversible methods.
 - Electronic media must be wiped or physically destroyed.
 - Disposal must be documented and approved by the COO.
-

11. Violations

- Any employee found to have willfully or negligently violated this policy may be subject to disciplinary action, up to and including termination.
 - Failure to report known violations will also result in disciplinary action.
 - Incidents of accidental disposal must be reported immediately to the COO.
-

12. Related Procedures

12.1 Updating the Behavior Technician Registry

1. Log into Cognify.
2. Filter course list for “Behavior Technician Level One” completions.

3. Export required learner data (name, certificate number, completion date, standing, status, certificate type).
4. Import into Obvibase following system prompts.
5. Verify data accuracy.

12.2 Course Access Control

- Super Administrators may restrict course access to specific users or revoke access when necessary.
 - Learners may only access content online; downloading is prohibited.
-

13. Review & Revision

This policy will be reviewed annually by the COO and Director of Programs to ensure compliance with ANSI/ASTM E2659-24 and updated as needed.

XIV. DOCUMENT CONTROL

(E2659-18 5.2.2.1)

14A POLICY: BTL1 management shall have a process for document control (5.2.2.1)

14B PURPOSE: The purpose of this policy is to address: the proper control of document creation, approval, revision and re-approval, distribution, and prevention of obsolete document use.

14C PROCEDURE:

1. Document creation and saving
 - a. Any member of the management team or staff can create a document
 - b. Non-controlled Optimus Education documents are to be stored in a cloud drive accessible by all BTL1 management and staff.
 - c. All controlled BTL1 documents will be created by approved employees as a Google document and saved in a Google Drive owned by the COO.
 - d. Each course should have a course folder.
 - i. Documents for ANAB accreditation will be stored in shared folders clearly named as BTL1 Accreditation documents.
 - e. Within each folder should be a folder called “Working Files” for documents being worked on and “Final” for final versions of documents.
 - i. Working files should be labeled “Document name -working” and saved in the Working Files folder.
 - ii. Finalized documents should be named “Document Name -Year.Month” and moved to the Final folder
2. Document review and approval
 - a. Google Docs saves every version of a document. In working documents, the latest version is to be used, by checking the version history of the document.
 - b. Document revisions if related to any accredited certificate activities must be approved by the COO.
 - c. Any revisions to approved Certificate Activities must be reviewed and approved by the COO.

- d. Any revisions to policies and procedures to the certificate program activities must be reviewed and approved as part of a quality assurance process for accuracy and compliance with ANAB standards.
 - e. Review is initially completed by the management team and final approval by COO.
3. Document Revisions
- a. Controlled documents that are finalized are dated with date of last revision (year.month) and saved in a “read only” file for non-approved editors.
 - b. Once revisions are drafted, they follow an approval process similar or identical to the initial document review and approval process
4. Controlled Documents
- a. The following documents can only be revised by stated employees.
 - b. COO has final approval of all controlled documents.
 - c. Controlled documents are to be saved in a “read-only” file available to all BTL1 staff and management.
 - d. Controlled documents are solely owned by the COO.

Type of Document	Who Can Create and Revise	Final Approval
Policies and Procedures	BTL1 Management	COO
CDIDP	BTL1 Management	COO
BTL1 Syllabus	BTL1 Management	COO
All BTL1 Content (both on Google Drive and Tovuti Platform)	BTL1 Management	COO
Financial Records	OE Finance Director	COO

5. Archiving Documents

- a. The most recently dated version of any document should always be used, unless otherwise indicated.
- b. The obsoleting of documents, or their removal from availability, is determined by date (if a newer revision exists) or it can occur when documents (or the contents they reference) are replaced.
- c. The old version is moved to the Archived Documents folder by BTL1 management.

XV. INTERNAL AUDIT

15A POLICY: Optimus Education's internal audit be planned and conducted annually and the results of the audits shall be documented and communicated to certificate program management.

15B PURPOSE: The internal audit is conducted to ensure quality management and oversight of the Certificate Plan of the BTL1 and that the implementation of the Certificate Plan follows all standards and requirements for accreditation.

15C PROCEDURE:

15C(i) Optimus Education will conduct internal audits annually. A person not directly related to the program will conduct the audits. 5.2.4.1

15C(ii) The results of the audit will be submitted in a written document to the Director of Programs, who will then disperse it to Optimus Education management and the BTEC Council (if necessary) for review and approval. 5.2.4.2

1. Annually a representative will be identified to conduct the internal audit.
 - a. A person not directly related to the program will conduct the audits. 5.2.4.1
 - b. Where procedures do not currently exist, they must be created and then audited within six months of the original audit.
 - i. This will be identified as a corrective action plan to stay in compliance with 5.2.4 and documented in the internal audit documentation.
2. The auditor will review all policies and procedures relevant to the BTL1 certificate program. Including, but not limited to:
 - a. Advisory Group Composition And Responsibilities (E2659-18 5.1.4, 5.1.4.1, 5.1.4.2, 5.1.4.3)
 - b. Certificate Program Instructional Design Plan (E2659 6.1, 6.1.1, 6.1.2)
 - c. Certificate Issuance And Use (E2659 7.1., 7.1.1, 7.1.1., 7.1.1.2, 7.1.1.3, 7.1.1.4, 7.1.1.5)
 - d. Invalidating A Certificate (7.1.1.5)
 - e. Complaints (E2659 5.8, 5.8.1, 5.8.2, 5.8.3, 5.8.4)
 - f. Appeals (E2659 5.9, 5.9.1, 5.9.2, 5.9.3, 5.9.4)
 - g. Privacy, Confidentiality, And Security (Updated January 2018)
 - h. Program Commercial Support And Disclosure (E2659 5.6.3)
 - i. Fees, Cancellations, And Refunds
 - j. Nondiscrimination
 - k. Personnel (E2659 5.3., 5.3.1, 5.3.2, 5.3.3, 5.3.4, 5.3.5, 5.3.6)
 - l. Outsourcing (E2659 5.6, 5.6.1, 5.6.1.1, 5.6.1.2, 5.6.1.3, 5.6.2)

- m. Records Control (E2659 5.2.3, 5.2.3.1, 5.2.3.2, 5.2.3.3, 5.7.1, 5.7.2)
- n. Document Control (E2659 5.2.2.1)
- o. Internal Audit (E2659 5.2.4, 5.2.4.1, 5.2.4.2)
- p. Management Review (E2659 5.2.6, 5.2.6.1, 5.2.6.2, 5.2.6.3, 5.2.6.4)
- q. Corrective And Preventive Action (E2659 5.2.5, 5.2.5.1, 5.2.5.2, 5.2.5.3, 5.2.5.4)
- r. Learner identity verification and security of assessment (E2659 6.1.6.5)
- s. Monitoring for Regulatory or Statutory Requirements
- t. Exam Take Retake Policy

Any other policies and procedures related to the certificate program must be audited as well.

3. Procedure of audit

- a. Identify policies and procedures to be audited
 - i. Audit all policies and procedures listed above
 - ii. Also audit any other policies and procedures related to the certificate program, but may not be included above
- b. Review each policy and procedure to ensure it meets the ANAB standard.
- c. Review evidence to ensure the BTL1 program and staff and management are in compliance with the policies and procedures.
 - i. If found not in compliance, the issues are identified and a corrective action plan is put in place to bring the program into compliance.
 - ii. The corrective action plan will be added to the corrective action plan worksheet noting the person responsible for the plan and projected completion date.

XVI. MANAGEMENT REVIEW

(E2659-18 5.2.6, 5.2.6.1, 5.2.6.2, 5.2.6.3, 5.2.6.4)

16A POLICY: Optimus Education will conduct a management review at least once a year in accordance with ANSI standards.

16B PURPOSE: BTL1 shall have a process for its certificate program management to review the management system to ensure continued suitability, adequacy, and effectiveness.

16C PROCEDURE:

1. Optimus Education's Management review process will include the following elements:
 - a. Results of internal audits;
 - b. Results of external audits, if available;
 - c. Status of corrective or preventive actions;
 - d. Results of contractor performance monitoring;
 - e. Results of program evaluation(s);
 - f. Complaints received;
 - g. Appeals received; and
 - h. Follow-up actions from previous management reviews
 - i. Progress towards objectives
2. The Optimus Education's Management Review process will follow the steps outlined below:
 - a. Management will include, but not be limited to, COO and Director of Programs.
 - b. Documentation for all of the relevant information identified above will be disseminated to the management team.
 - c. Management will meet to review documentation in a timely fashion (after all relevant documents are completed and before annual accreditation assessment).
 - d. After discussion of all relevant elements, management documents the meeting discussions and outputs.
 - e. The output of the management review shall include at minimum, decisions and, if applicable, actions related to the following:
 - i. Improvement of the management system;
 - ii. Improvement of the certificate program activities;
 - iii. Resource needs.
 - f. Any improvements or resources determined to be needed shall be added to corrective and preventive action plans.

XVII. CORRECTIVE AND PREVENTIVE ACTION

(E2659 5.2.5, 5.2.5.1, 5.2.5.2, 5.2.5.3, 5.2.5.4)

17A POLICY BTL1 management shall have a process for identifying current or potential issues in its certificate program activities and for managing corrective and preventive actions. 5.2.5.1

17B PURPOSE: To define the process for identifying current and potential issues in the certificate program and for managing corrective and preventive actions. The Company wishes to provide a comfortable and pleasant on-line learning experience, and will work with the learner to provide reasonable and fair solutions to any corrective action.

17C PROCEDURE:

17C(i) Monitoring for Corrective or Preventive Actions Needed. Optimus Education management and staff will continuously monitor complaints, appeals, helpdesk requests, stakeholder feedback, and changes in the ABA field in order to identify current or potential issues in its certificate program activities and for managing corrective and preventive actions. 5.2.5.1

1. Proactive Management (updated 3/2022)

a. Coursework

- i. Periodically (at least twice a year) trends will be reviewed in the helpdesk data to proactively identify potential issues related to quiz questions, technical issues, and trends in feedback and all aspects of certificate program activities
- ii. If a trend is noted (complaints about a specific issue, quiz questions, content, and or instructor feedback and response), the management team will pull information and documentation to establish a data driven trend.
- iii. Possible trends will be identified and discussed at ~~quarterly~~ BTEC Council meetings
- iv. Thresholds to be determined but initially 3 or more complaints/helpdesk inquiries will trigger a management review
- v. All reviews will be noted on spreadsheet that tracks complaints and appeals
- vi. Corrective and preventive actions plans will be documented and noted on spreadsheet

b. Management

- i. Annual Review of quality indicators will occur in conjunction with Management review
- ii. Unless otherwise indicated by an event that will impact immediate viability of the BTL1 Certificate Program, reviews will happen on a quarterly basis through quarterly management meetings.
- iii. Continuous Quality Management activities will be identified through quality indicators which will include but not be limited to:
 - 1. New evidence-based treatment strategies
 - 2. Annual needs assessment (demand for services, turnover rates, billing rates, credentialing requirements, training requirements)
 - 3. Financial status
 - 4. Regulatory and jurisdictional challenges
 - a. Payer requirements
 - b. State legislation

17C(ii) Identification of Issues. Optimus Education management, with the assistance of instructors and the support desk, shall identify the causes of issues/potential issues and plan for their correction/prevention. Once corrective action has been issued, BTL1 shall also determine if there are preventive actions that can be taken to prevent that issue from recurring. 5.2.5.2

17C(iii) Action Plan. Once the corrective/preventive action plan is in place, BTL1 management shall approve, and appropriate staff shall implement, said corrective and preventive action in a timely manner. 5.2.5.3

If a learner or participant does not receive an adequate and timely response to the issue, or feels that there is inappropriate conduct or activity on the part of Optimus Education LLC management, its employees, vendors, customers, or any other persons or entities related to the company, Optimus Education requests that you bring this concern in writing to the immediate attention of Optimus Education. Please refer to the Complaints and/or Appeals Policy for details on this process.

17C(iv) Documentation. A spreadsheet documenting all corrective and preventive actions shall be maintained by BTL1 management and staff. 5.2.5.4

17C(v) Not Meeting Course Requirements. When an individual is seen to be falling behind or not meeting course requirements, the following will occur:

- a. The individual is contacted via the integrated messaging system, offering assistance.
- b. The individual is tutored and advised to use the integrated Bulletin Board and Chat Room facility and connect with their peers who are also completing the training material. Experience has proven this to be a most effective and non-threatening means of assisting progress.
- c. We encourage the formation of “online study groups” made up of their peers.
- d. We work with others within the organization to support the individual.
- e. Each course or certification has a specific time allotted for completion and each learner is notified upon registration of the time allotted and the expiration date in the system. If the student has not had activity on-line or is close to the expiration date, the system will warn the learner of the pending date. Once the expiration date has passed, access to the system will be terminated and the learner will need to complete a written request for extension. Depending on the length of time after the expiration date, a fee or tuition may apply.

17C(vi) Cheating. If an individual is known to be involved in cheating, the action taken by the Company may vary depending on the issue. The following are the most common problems and the course of action:

Issue: An individual is logging in on another learner’s log in. Action: The account will be put on hold and the individuals involved will be assigned a new log in and will be required to start the courses from scratch.

Issue: An individual is using a code for tuition that belongs to another learner. Action: The account or accounts will be put on hold and the immediate supervisor will be informed. The individual using the code will be expected to pay the tuition and assigned a separate code.

17C(vii) Inappropriate Language. If a learner posts inappropriate comments or language, the Company will address the issue with the learner. If the problem persists, the Company may notify the supervisor and may take further action up to suspension of the account.

XVIII. Security of Assessment and Verification of Student Identity

(E2659-24)

18A. Scope

The policy applies to all students enrolled in all courses offered by Optimus Education beginning with the application for admission and continuing through a student's tenure from beginning the course to completing the lessons, assessments, and exercises.

18B. Policy

All courses and programs offered through Optimus Education must verify that the student who registered for a course or program is the same student that participates in and completes the program as a whole, including the lessons and assessment.

18C. Procedure

The verification of a student's identity begins at the time of the initial course registration. After a student has been through the registration process and is accepted, the process for creating secure, unique login and password for the student is completed.

The registration procedure includes the requirement that the student agrees to the terms and conditions including the acceptance of the “Fraud” clause within which it is articulated that any course/program credit, credential, or certificate will be **invalidated** should any information provided, including identity, be unable to be verified or was found to be fraudulent in any way.

During assessment, if a learner works for an organization, the organization is expected to ensure learner identity verification is valid. In addition, it is emphasized to learners and employers that any form of attempt to invalidate the security of the assessment (e.g., cheating off another person, providing false identification, giving answers or questions to another person) will result

in the immediate termination of the student's access to the course or invalidation of the learner's certificate (if the certificate had already been completed when the fraud was discovered).

On a quarterly basis, a sample of randomly selected student records will be reviewed and audited with a view to verify the veracity of the information provided including identity.

Login Information Security

When a student first logs in, they are prompted to set up security questions that allow electronic retrieval of their password if the student forgets their password. Students may reset their password by visiting the "password reset" link.

If a student cannot recall the answer to their security questions, they are required to submit valid photo identification to Optimus Education in order to reset their password.

Students are responsible for maintaining the security of their login information and password. This information may not be shared or given to anyone other than the person to whom they were assigned. Users are responsible for any use and activity of their account.

Security of Assessment Data

The summative assessment and the item bank is stored on a secure HIPAA-compliant cloud server and is password protected. It is only accessible by authorized individuals and program managers.

XIX. Monitoring of Regulatory or Statutory Requirements

Monitoring of regulatory and statutory requirements will occur through the following processes

1. Active Membership of Professional groups, social media special interest groups, newsletters, email lists
2. Monitoring applicable state regulations through listservs and/or mailing lists
3. Membership of listserv of major payers (Health Insurance, State Departments of Services)

XX. Exam Retake Policy (updated July 2024)

POLICY: Optimus Education believes that students should be given the opportunity to retake the final exam one time.

PURPOSE: Exam retakes can be viewed as best practice in fairness to students in that it helps to avoid classification error, and it can provide opportunity for student remediation. However, restricting the number of retakes is also fair to students as it provides a limit to students who may never be successful. The fairness of allowing retakes is in line with the values of Optimus Education. However, in order to address exam security and limit repeat exposure to the exam content a test take-retake policy is necessary.

PROCEDURE:

1. Student is allowed to take the final once (as part of the course) and then retake the final one time without issue.
2. **If the student fails the retake attempt, the student and employer/supervisor (if an employer paid for the course) are notified.**
3. **In this case, the student will be asked to retake the course.**
4. If the student retakes the entire course, the student receives another two attempts (an original attempt in the progression of the course and one retake attempt) at the final.
5. If the student does not pass the exam after the four attempts, the student must wait six months before being allowed to re-enroll in the course.

XXI. ACADEMIC INTEGRITY

SECTION 1 – PREAMBLE

In its mission to provide a career-oriented education, Optimus Education strives to create a global community of students.

The foundation of academic work is intellectual integrity, credibility, and trust. A learning community can only be maintained if its members believe that their work is judged fairly and held to a high academic and ethical standard. For these reasons, it is essential that all members of the Optimus Education community understand our shared standards of academic honesty. More than just a series of regulations, the Academic Integrity Policy serves as a guide and resource for students for understanding these standards and their importance in our educational mission.

SECTION 2 – DEFINITIONS

A. ACADEMIC INTEGRITY

Academic integrity is the pursuit of scholarly work in an open, honest, and responsible manner. Academic integrity is a basic guiding principle for all academic activity, and all members of the community are expected to act in accordance with this principle. Academic integrity includes a commitment to engage in academic work that adheres to the highest standards of academic honesty. These standards include purposeful avoidance of plagiarism, cheating, misrepresentation, unauthorized collaboration, or any efforts at facilitating any academic deception. Such acts of dishonesty violate the fundamental and ethical principles of the community and compromise the worth of work completed by others.

Additionally, dishonesty in a workplace can also lead to serious consequences, up to and including termination of employment or expulsion from school. Optimus Education takes seriously its mission to uphold academic integrity and to educate its students to use integrity in all of their work.

B. ACADEMIC DISHONESTY

All members of the Optimus Education community are expected to apply high standards of academic integrity and ethical behavior in completing assignments for evaluation and testing. Any practice or conduct by a member of the Optimus Education community that deviates from the ethical standards that are expected within the professional community, and as outlined in this policy, constitutes academic dishonesty.

Plagiarism: Plagiarism refers to representing the words or ideas of another as one's own in any academic exercise without providing proper documentation of source. It is the responsibility of all students to understand the methods of proper attribution and to apply those principles in all written, oral, and electronic submissions.

Examples include, but are not limited to:

- Copying information word for word from a source without using quotation marks and giving proper acknowledgement by way of footnote or endnote.
- Paraphrasing or putting into one's own words information from a source without providing proper acknowledgement/citation.
- Reproducing without proper citation any other form of work of another person.
- Unauthorized purchasing, possessing, taking, copying, or sharing of information to complete academic work.
- Unauthorized assistance with academic work (e.g. excessive editorial assistance, translation services, applications, and sites, etc.)

What percentage of plagiarism is generally acceptable in academic writing?

<u>Type of content</u>	<u>What percentage of plagiarism is acceptable</u>
General academic writing	15-20%
Essays	20-25%

Thesis and dissertations	5-15%
Published journals	5%-15%

Cheating: Cheating refers to intentionally using or attempting to use unauthorized materials, information, or study aids in any academic exercise.

Examples include, but are not limited to:

- Copying from another student's examination, research paper, assignment or case write-up.
- Possessing or using unauthorized notes, text, or other aids during an examination, quiz, or other assignment.
- Looking at someone else's exam before or during an examination.

Fabrication: Fabrication refers to the intentional and unauthorized falsification, misrepresentation, or invention of any information, data, or citation in any academic exercise.

Examples include, but are not limited to:

- Falsifying or altering the data collected in the conduct of research or assessment.
- Making up a source as a citation in an assignment or citing a source one did not use.
- Attempting to deceive the instructor by altering and resubmitting as original work or for additional credit assignments, tests, quizzes, or exams that have been graded and returned.

Facilitation: Facilitation refers to intentionally or knowingly assisting any person with an academic integrity violation.

Examples include, but are not limited to:

- Allowing another student to copy one's answers during an assessment.
- Giving another student one's own assignment to copy and submit as their own assignment.
- Taking an assessment or writing an assignment for another student.

Participation in Dishonest Acts: Some dishonest acts that undermine the fundamental values of an intellectual community fall outside of the more specific academic integrity violations described above.

Examples include, but are not limited to:

- Purchasing a pre-written or custom-written paper.
- Selling, loaning, or otherwise distributing materials for the purpose of cheating, plagiarism, or other academically dishonest acts.

SECTION 3 – REPORTING VIOLATIONS OF ACADEMIC INTEGRITY

Students and staff share in the responsibility for maintaining the academic standards of Optimus Education, for promoting integrity, and for upholding the Academic Integrity Policy. To protect the rights and maintain the trust of honest students and support appropriate behavior, instructors will regularly communicate high standards of integrity (i.e. within syllabi, assignments, exams, etc.) and reinforce them by taking reasonable steps to anticipate and deter acts of dishonesty in all assignments and examinations.

To promote a learning environment that is built upon the fundamental values of honesty, trust, fairness, respect, and responsibility, each community member is encouraged to confront instances of suspected wrongdoing and to report alleged violations of the Academic Integrity Policy to the appropriate instructor. Students are not obligated to report suspected violations, but they are encouraged to do so. Students may also approach those involved in alleged academic dishonesty to remind them of their obligation to uphold standards of academic integrity.

SECTION 4 – ACADEMIC DISHONESTY REVIEW PROCESS

There are two types of forums provided by this code to review alleged violations of the Academic Integrity Policy:

A. ACADEMIC RESOLUTION (INFORMAL)

The instructor has the primary responsibility for control over academic behavior and maintenance of academic integrity. Students involved in academic dishonesty, either directly or indirectly as a participant, are immediately responsible to the instructor of the course who is obligated to address the alleged violation.

Academic resolutions are conducted by the instructor of the course in which an alleged violation of the Academic Integrity Policy has occurred. When an instructor suspects that a student may have violated the policy in this manner, the instructor shall inform the student of the concerns within five (5) business days of the discovery and present the student with any supporting evidence and documentation. The student shall be afforded the opportunity to respond to the allegations and to offer an explanation during the academic resolution meeting or via email, if the student is unable to meet.

If, after five (5) business days, the student is unresponsive to the instructor's efforts to discuss the academic integrity concerns, the process to address the matter will proceed without the student's participation.

1. Student Accepts Responsibility: At an academic resolution meeting or via email correspondence, if the instructor and the student agree that a violation has occurred and the student accepts responsibility for the violation, the instructor may at their discretion impose the following academic sanctions or grade penalties:

- Issue the student an oral warning together with information/resources about what is acceptable academic conduct.
- Change the grade on the assignment, including lowering or assessing a failing grade.
- Change the grade for the course, including lowering or assessing a failing grade.
- Allow the student to resubmit the assignment or retake the exam.
- Assign additional academic work or alternative assignments.

The instructor must also notify the dean of students of the violation by submitting an Academic Dishonesty and Resolution Reporting form within two (2) business days of the conclusion of an academic dishonesty and resolution meeting or their receipt of written/mailed confirmation from the student regarding the violation.

Imposing Additional Sanctions for Violations:

Disciplinary probation, suspension, expulsion, or removing a student from a program are outside the remit of the instructor and may not be issued as part of the academic resolution process. These sanctions may only be rendered through Optimus Education's Appeals Board.

2. Student Does Not Accept Responsibility: If the student does not accept responsibility and/or disputes the allegation or decision of the instructor at the academic resolution meeting, the instructor will assign an incomplete grade on the assignment or in the course, pending the outcome of a hearing before the Appeals Board as outlined above. Students assigned an incomplete grade will be allowed to continue in the course without prejudice, pending the outcome of the formal student conduct process.

At the conclusion of the student conduct process, the instructor will submit a change-of-grade form reflecting the outcome of the student conduct hearing and the instructor's evaluation of the student's work in the course.

3. Meeting with the Dean of Students (or assignee): Upon notification, the dean of students (or assignee) may meet with the student who has accepted responsibility for a violation of the Academic Integrity Policy to review the policy and to stress its importance; outline the resources and services provided by the college to assist students who may be experiencing academic difficulty; and issue a written warning indicating that a further violation of the Academic Integrity Policy will be attended by more serious student conduct sanctions. In cases where a student is assessed and accepts a failing grade for the course by the instructor, the student will be informed that they are no longer allowed to attend the class. In cases where the student does not accept responsibility for a violation of the Academic Integrity Policy, Optimus Education will initiate a formal student conduct process.

4. Academic Resolution Appeals: A student who accepts responsibility and agrees with the academic sanctions or grade penalties imposed by the instructor as part of the academic resolution process cannot appeal the decision to a higher authority. The decision and sanctions imposed by the instructor are final. A student who does not accept responsibility and/or disputes the allegation or decision of the instructor has the right to have the matter reviewed.

Withdrawal from the Course Pending Resolution: Students are permitted to withdraw from a course after an alleged violation is reported. If an instructor determines that a student has violated the Academic Integrity policy, and the student withdraws from the course, the instructor shall inform the Program Director including all supporting documentation. The Program Director shall review the student's conduct file to determine if there are multiple academic integrity violations and/or if the case should be elevated. Ultimately, the dean of students will update the student's disciplinary file to reflect the final resolution.

xxii. Policy on Use of Technology-Enabled Automation, Including Artificial Intelligence

Effective Date: October 2025

Review Date: October 6, 2025

Approved By: [Certificate Program Management / BTEC Council]

Part I: Optimus Education's Guidelines for AI Usage

1. Policy Statement

Optimus Education is committed to ensuring that the use of technology-enabled automation, including artificial intelligence (AI), in the design, delivery, assessment, and administration of certificate programs is transparent, ethical, fair, and aligned with the requirements of **ANSI/ASTM E2659-24**. Technology and AI tools shall be used only in ways that protect learner privacy, maintain instructional integrity, support equitable outcomes, and preserve the validity and reliability of the certificate program.

2. Purpose

This policy ensures that technology-enabled automation and AI tools:

- Support, but do not replace, human oversight in critical decision-making.
- Protect against bias or discrimination in learning, assessment, or certificate issuance.
- Provide accurate, secure, and consistent services to learners and certificate holders.
- Comply with all applicable accreditation, regulatory, and statutory requirements.

3. Scope

This policy applies to:

- All staff, contractors, and instructors using technology-enabled automation or AI for course delivery, assessment, learner support, or records management.
 - All certificate programs offered by Optimus Education through digital platforms, including the Tovuti LMS.
-

4. Definitions

- **Technology-Enabled Automation:** Use of software systems, algorithms, or digital processes that perform tasks without continuous human intervention (e.g., automated grading, certificate generation).
 - **Artificial Intelligence (AI):** Systems capable of simulating human intelligence processes, including natural language processing, machine learning, and predictive analytics.
 - **Human Oversight:** Direct review and intervention by qualified staff to ensure decisions made or supported by automation/AI are valid, fair, and accurate.
-

5. Policy Provisions

5.1 Transparency and Disclosure

- Learners shall be informed when technology-enabled automation or AI tools are used in learning or assessment.
- The purpose and limits of automation/AI shall be clearly communicated in course materials or policies.

5.2 Human Oversight

- All AI-supported decisions that impact learner progression, assessment outcomes, or certificate issuance must be verified by qualified staff.
- Automated grading may be used for objective assessments (e.g., multiple-choice), but subjective assignments must be reviewed by human instructors.

5.3 Fairness and Equity

- AI and automation systems shall be periodically reviewed to identify and mitigate potential bias.
- Learners may request human review of any automated decision.

5.4 Data Privacy and Security

- Use of AI must comply with Optimus Education's data protection policies.
- Personal data shall not be shared with external AI tools unless explicitly approved and secured under contract or data protection agreements.

5.5 Reliability and Accuracy

- Automated and AI tools must undergo validation and routine monitoring to confirm they function as intended.
- Errors or anomalies identified in automated processes must be documented, reported, and corrected promptly.

5.6 Continuous Improvement

- AI/automation tools shall be evaluated as part of internal audits and management reviews.

- Updates, risks, and learner feedback on technology-enabled automation shall be considered in continuous improvement processes.
-

6. Procedures

1. **Approval:** New AI/automation tools must be reviewed and approved by management prior to implementation.
 2. **Training:** Staff shall be trained in the ethical and effective use of automation/AI tools.
 3. **Monitoring:** Performance of AI systems shall be monitored quarterly; findings are reported in management review meetings.
 4. **Incident Handling:** Any concerns raised by learners about automation/AI shall be documented and resolved by designated staff within 10 business days.
 5. **Review Cycle:** This policy shall be reviewed annually, or sooner if significant new technology is introduced.
-

7. Responsibilities

- **Program Director:** Ensures compliance with accreditation standards and oversees implementation.
 - **IT / LMS Administrators:** Manage technical integration, data security, and monitoring of AI systems.
 - **Instructors:** Maintain academic integrity by verifying automated outputs and applying professional judgment.
 - **Learners:** Report concerns related to automation or AI use in learning or assessment.
-

8. References

- ANSI/ASTM E2659-24, *Standard Practice for Certificate Programs*
- Optimus Education Records Control Policy
- Optimus Education Security and Identity Verification Policy
- Data Privacy and Confidentiality Policy

Part II: Student AI Usage Policy & Guidelines

Purpose: To establish guidelines for the use of Artificial Intelligence (AI) tools by students in the completion of written assignments. This policy aims to balance the benefits of AI as a learning tool with the importance of academic integrity and intellectual honesty.

Scope: This policy applies to all students enrolled in Optimus Education programs and courses.

Permissible Use of AI:

- **Readability:** Students may use AI tools to improve the readability and clarity of their writing. This includes tasks such as grammar checking, spelling correction, and sentence structure refinement.
- **Research Assistance:** AI tools can be used to assist with research, such as finding relevant sources or summarizing information. However, students must still cite their sources appropriately.

Prohibited Use of AI:

- **Complete Assignments:** Students may not use AI tools to generate entire assignments or papers. This includes using AI to write essays, reports, or other written work.
- **Plagiarism:** Using AI to generate content that is not original or properly cited constitutes plagiarism and will be treated as a serious academic offense.
- **Misrepresentation:** Students may not misrepresent the extent of their own work by claiming credit for AI-generated content.

Consequences of Policy Violation:

- Academic Penalties: Students who violate this policy may face academic penalties, including but not limited to:
 - Lowered grades
 - Requirement to redo the assignment
 - Course failure

Disciplinary Action: In severe cases of policy violation, students may be subject to disciplinary action, including suspension or expulsion.

Additional Considerations:

- Educator Guidance: Educators should provide clear instructions and expectations regarding the use of AI in their courses.
- Ethical Use: Students should be encouraged to use AI ethically and responsibly.
- Continuous Review: This policy will be reviewed and updated periodically to reflect changes in technology and educational practices.
- Plagiarism and AI Evaluation: Optimus Education utilizes advanced plagiarism and AI evaluation software to check every submitted assignment. This software can detect instances of plagiarism and identify content that may have been generated using AI tools.

By following this policy, Optimus Education aims to ensure a fair and equitable learning environment for all students while embracing the potential benefits of AI as a tool for education.

Student AI Usage Guidelines:

Use AI such as ChatGPT as a tool, not a substitute: The use of AI is meant to be an aid in completing assignments, not a substitute for critical thinking or original work. To do so risks violating our academic integrity policies and may result in consequences aligned with our academic misconduct policies. Students who use AI such as ChatGPT are expected to use it to supplement their own knowledge and ideas, not to provide complete answers to assignments.

You must acknowledge your use of AI: If using any AI tool, students must:

- Clearly acknowledge their use of this tool
- It must be cited as an outside source
- You must include a paragraph that explains what you used the AI for
- You must include what prompt(s) you used to get your results.

This paragraph must be written by you, not the AI!

Ensure accuracy: AI is a powerful tool, but it is not infallible. Students are responsible for ensuring the accuracy of any information or responses generated by AI. You will likely need to refine your prompt in order to obtain a good outcome. Assume numbers and facts are wrong unless you have checked with yourself through a valid source. You will be responsible for any errors or omissions.

Avoid plagiarism: Using AI to generate content that is identical or substantially similar to another source without proper attribution constitutes plagiarism. Students must ensure that any material generated by AI is properly cited and that any paraphrasing is done in accordance with academic standards.

Follow the course objectives: Students who use AI must do so in a manner that is consistent with the course objectives. Assignments should be completed in a way that demonstrates an understanding of the course content and learning objectives, with ChatGPT serving as a tool to aid in that process, not as the main mechanism for completing the assignment.

As always, our academic policies still apply. Your work must be your own, and you should adhere to Optimus Education's Code of Professional and Ethical Conduct in everything you do.

When in doubt, please reach out for clarification.

XXIII. Fairness, Equity, and Compliance Policy

Effective Date: August 1, 2025

1. Purpose

The purpose of this policy is to ensure that Optimus Education operates in a fair, equitable, and non-discriminatory manner, in compliance with applicable laws, regulations, and legal obligations. This policy provides a framework for consistent, transparent practices that promote equal access and treatment for all individuals involved in our certificate program activities.

2. Scope

This policy applies to:

- All employees, contractors, volunteers, and representatives of Optimus Education.
 - All applicants, learners, and certificate holders.
 - All stakeholders engaged in program activities, services, or interactions with the organization.
-

3. Policy Statement

Optimus Education is committed to:

1. Fair and Equitable Practices

- All decisions regarding admission, instruction, assessment, certification, and recertification will be based solely on merit, eligibility criteria, and performance as defined by our program requirements.
- Individuals will be treated with dignity, courtesy, and respect at all times, regardless of race, color, religion, gender, gender identity, sexual orientation, age, disability, veteran status, national origin, or any other protected characteristic.

2. Compliance with Laws and Regulations

- The organization will comply with all applicable federal, state, and local laws, as well as relevant international regulations, including but not limited to:
 - Equal Employment Opportunity (EEO) laws
 - Americans with Disabilities Act (ADA)
 - Title VI and Title IX of the Civil Rights Act
 - Data protection and privacy regulations (e.g., GDPR, CCPA)
- The organization will maintain up-to-date knowledge of legal requirements and adjust policies and practices accordingly.

3. Accessibility and Accommodation

- Reasonable accommodations will be provided to qualified individuals with documented disabilities, in accordance with applicable laws.
- Processes for requesting accommodations will be fair, transparent, and free of bias.

4. Complaint Resolution and Appeals

- Individuals who believe they have experienced unfair treatment, discrimination, or non-compliance may submit a formal complaint in accordance with the organization's **Complaint and Appeals Policy**.
- All complaints will be addressed promptly, objectively, and confidentially.
- Retaliation against individuals who submit complaints or participate in investigations is strictly prohibited.

4. Responsibilities

- **Executive Leadership:** Ensure resources and oversight for compliance with this policy.
 - **Program Managers:** Apply fair and equitable practices consistently and document compliance measures.
 - **Employees and Contractors:** Follow all procedures related to fairness, equity, and compliance; participate in training as required.
 - **Compliance Officer (or Designee):** Monitor regulatory requirements, maintain related documentation, and coordinate investigations of alleged violations.
-

5. Evidence of Compliance

To demonstrate adherence to this policy, Optimus Education will maintain the following records:

- Documented procedures for admissions, instruction, and assessment.
 - Training records on anti-discrimination, ethics, and compliance for staff and contractors.
 - Records of accommodation requests and outcomes.
 - Logs of complaints and resolutions (with confidential information protected).
 - Copies of relevant federal, state, local, and international compliance documentation.
 - Annual policy review records and updates.
-

6. Review and Continuous Improvement

This policy will be reviewed annually by the Compliance Officer (or designee) to ensure continued compliance with ANSI/ASTM E2659-24 standards, applicable laws, and best practices. Updates will be approved by executive leadership and communicated to all personnel and stakeholders.

XXIV. Certificate Designation and Use Policy & Procedures

Effective Date: August 1, 2025

1. Purpose

This policy and procedures document establishes clear rules for the correct use of certificate designations awarded by Optimus Education, in alignment with ANSI/ASTM E2659-24 standards. It ensures that:

- Certificate holders accurately represent their credential.
 - The designation is used only in a truthful and non-misleading manner.
 - The organization's intellectual property and brand integrity are protected.
-

2. Scope

This policy applies to:

- All individuals who have earned a certificate from Optimus Education.
 - All professional, promotional, and marketing uses of Optimus Education's certificate designations, logos, or related marks.
-

3. Definitions

- **Certificate Holder:** An individual who has successfully met the certificate program requirements and has been issued a valid certificate.
- **Certificate Designation:** The official title or abbreviation awarded by Optimus Education to indicate successful completion of the program (e.g., "Behavior Technician Level One – BTL1").

- **Misuse:** Any use of the designation or related marks that is unauthorized, misleading, or inconsistent with this policy.
-

4. Policy Statement

4.1 Authorized Use

- Certificate holders may display their designation in resumes, professional bios, email signatures, websites, and social media profiles, provided it is used exactly as issued.
- Designation use is permitted only while the certificate is valid and in good standing.
- When using the designation, certificate holders must include the full title or approved abbreviation exactly as provided by Optimus Education.

4.2 Prohibited Use

- Using the designation after certificate expiration, suspension, or invalidation.
- Altering, abbreviating, or modifying the designation without written approval.
- Implying the credential is equivalent to a license or government-issued qualification.
- Using Optimus Education's logo or marks without prior authorization.

4.3 Representation of Scope

- Certificate holders must not overstate the scope of their training or competencies.
- Public claims of expertise must be directly related to the learning outcomes of the certificate program.

4.4 Duration of Use

- Designation use begins on the certificate issuance date.

- Use must cease immediately upon certificate expiration, suspension, or revocation.
-

5. Procedures

5.1 Issuance of Designation

1. Upon successful completion of the certificate program, the individual's name and designation are entered into the official certificate holder registry.
2. The certificate holder is provided:
 - The certificate (digital or printed).
 - The exact wording and abbreviation of the designation.

5.2 Monitoring Use

1. The organization will periodically review publicly available sources (e.g., LinkedIn, websites, advertisements) to ensure compliance.
2. Reports of suspected misuse will be investigated by program management.

5.3 Responding to Misuse

1. If misuse is identified:
 - **Step 1:** Notify the individual in writing, specifying the misuse and required corrective action.
 - **Step 2:** Allow a reasonable timeframe (e.g., 15 business days) for correction.
 - **Step 3:** If the misuse continues, the certificate may be suspended or **invalidated**.
2. In cases of intentional or fraudulent misuse, the organization reserves the right to issue a public statement, pursue legal remedies, or both.

5.4 Renewal of Rights to Use Designation

1. If the certificate program includes renewal requirements, certificate holders must meet all renewal criteria to continue using the designation.
 2. Upon renewal, a new certificate will be issued with updated dates, and the right to use the designation is extended until the new expiration date.
-

6. Enforcement

Failure to comply with this policy may result in:

- Written warnings.
 - Suspension or invalidation of the certificate.
 - Legal action in cases involving intellectual property infringement or fraud.
-

7. Records and Documentation

To demonstrate compliance with ANSI/ASTM E2659-24, the organization will maintain:

- Records of all issued certificates and designation holders.
- Logs of investigations and resolutions of reported misuse.
- Renewal and expiration tracking records.

XXV. Accommodations Policy & Procedures

Effective Date: August 1, 2025

1. Purpose

The purpose of this policy is to ensure that Optimus Education provides reasonable accommodations to qualified learners with documented disabilities or other protected needs, in compliance with applicable laws and ANSI/ASTM E2659-24 requirements. This policy supports equitable access while maintaining the integrity of the certificate program's learning outcomes and assessments.

2. Scope

This policy applies to:

- All applicants, enrolled learners, and certificate holders in [Program Name].
 - All certificate program staff, contractors, and administrators who handle accommodation requests.
-

3. Definitions

- **Accommodation:** A modification or adjustment to learning or assessment conditions that enables equal access without lowering standards or altering the essential requirements of the program.
- **Qualified Learner:** An individual who meets all eligibility requirements for the certificate program and has a documented disability or condition that substantially limits one or more major life activities.
- **Undue Burden:** An accommodation that would fundamentally alter the nature of the program, cause significant difficulty, or impose excessive cost.

4. Policy Statement

Optimus Education is committed to:

1. Providing reasonable accommodations for learners with documented disabilities or protected needs.
 2. Ensuring that accommodations do not compromise the validity or integrity of program assessments or learning outcomes.
 3. Reviewing requests in a fair, consistent, and timely manner.
 4. Maintaining confidentiality of all accommodation-related information.
-

5. Procedures

5.1 Requesting an Accommodation

1. **Submission Timeline:** Learners are encouraged to submit accommodation requests at least **10 business days** before the start of the program or assessment.
 2. **Submission Method:** Requests must be submitted in writing to the Program Director.
 3. **Required Documentation:** Requests must include supporting documentation from a licensed healthcare or educational professional describing:
 - The nature of the disability or condition.
 - Functional limitations relevant to the program or assessments.
 - Recommended accommodations.
-

5.2 Review of Requests

1. The **Program Director** (or designated staff) will review all requests and documentation.
 2. The coordinator may consult with the learner, relevant staff, or external experts to clarify needs and potential solutions.
 3. A decision will be made within **10 business days** of receiving complete documentation.
-

5.3 Decision and Communication

1. The learner will receive a written decision detailing:
 - Approved accommodations.
 - Denied requests and reasons (e.g., undue burden, impact on program integrity).
 - Instructions for implementing the accommodation.
 2. If the request is denied, the learner may appeal using the **Complaint and Appeals Policy**.
-

5.4 Implementation of Accommodations

- Approved accommodations will be coordinated with relevant program staff, assessment administrators, or LMS administrators.
- Examples of possible accommodations include, but are not limited to:
 - Extended time limits on assessments.
 - Alternative formats for learning materials (e.g., large print, audio).
 - Screen reader-compatible content.

- Adjusted scheduling.
-

5.5 Confidentiality

- All medical and personal information submitted for accommodation purposes will be kept confidential and stored securely.
 - Only staff with a legitimate need to know will have access to this information.
-

5.6 Monitoring and Documentation

- The Accommodations Coordinator will maintain records of all accommodation requests, decisions, and implementation actions for **two years**.
 - Records will be available for review during ANAB audits to demonstrate compliance.
-

6. Enforcement

Failure to comply with this policy by staff or contractors may result in corrective action, up to and including termination of employment or contract.

7. Review and Revision

This policy will be reviewed annually by the Compliance Officer (or designee) to ensure alignment with ANSI/ASTM E2659-24, applicable laws, and best practices for accessibility. Updates will be communicated to all staff and published in the program's policy repository.

XXVI. Financial Controls Policy and Procedure

Effective Date: 07/01/2025

Approved By: Executive Leadership

Applies To: All personnel involved in financial transactions, reporting, and management related to the BTL1

Standard Reference: ANSI/ASTM E2659-24, Sections on Governance and Financial Integrity

1. Purpose

The purpose of this policy is to establish financial control measures to ensure that all financial activities related to the BTL1 program are accurate, transparent, compliant with applicable laws, and aligned with ANSI/ASTM E2659-24 standards. These controls safeguard assets, maintain fiscal responsibility, and prevent fraud or misuse of funds.

2. Scope

This policy applies to all staff, contractors, and authorized representatives who manage, process, or approve financial transactions for the certificate program, including tuition payments, refunds, vendor payments, and operational expenditures.

3. Policy Statement

The organization shall maintain robust financial controls that:

- Protect program assets from loss, theft, or misuse.
- Ensure that financial records accurately reflect transactions and are maintained in compliance with generally accepted accounting principles (GAAP).
- Include segregation of duties, approval requirements, and regular monitoring to detect and prevent errors or fraud.

- Provide transparent, accurate, and timely reporting to leadership and relevant oversight bodies.
-

4. Roles and Responsibilities

4.1. Executive Leadership (COO, Director of Programs)

- Oversee the financial integrity of the certificate program.
- Approve budgets, financial reports, and major expenditures.
- Review financial statements quarterly.

4.2. Finance Department / Designated Financial Officer

- Maintain accurate financial records.
- Ensure compliance with policy and applicable laws.
- Prepare monthly and quarterly financial reports.
- Manage internal audits and coordinate with external auditors as needed.

4.3. Program Management

- Review and approve program-related expenses within assigned limits.
 - Ensure expenditures align with the approved budget.
-

5. Procedures

5.1. Budgeting

1. An annual budget for the certificate program will be prepared by the Finance Department and reviewed by the Program Director.
2. Final approval of the budget will be made by Executive Leadership before the start of the fiscal year.
3. Any deviation greater than 20% from the approved budget must be justified in writing and approved by the COO.

5.2. Revenue Collection

1. All tuition and fees must be collected through approved payment systems with secure, PCI-compliant processing.
2. Payment records must be reconciled daily by a finance team member not involved in processing the payment.

5.3. Expenditure Approval

1. All expenditures must be supported by original documentation (invoices, receipts, contracts).
2. Approval authority is based on predefined thresholds:
 - Under \$500: Program Manager approval
 - \$500–\$5,000: Director of Programs approval
 - Over \$5,000: COO approval
3. No individual may approve their own reimbursement or payment.

5.4. Segregation of Duties

To reduce the risk of fraud or error:

- Different individuals will be responsible for **authorizing transactions, recording transactions, and reconciling accounts**.
- No single individual will have end-to-end control of a financial transaction.

5.5. Reconciliation and Reporting

1. Bank and payment processor statements will be reconciled monthly by the Finance Department.
2. Yearly financial summaries will be provided to the Advisory Group for review.
3. Annual financial reports will be included in the management review documentation required under ANSI/ASTM E2659-24.

5.6. Refunds

1. Refunds will be issued in accordance with the program's published refund policy.
2. All refunds require documented justification and approval from the Program Manager.

5.7. Internal and External Audits

1. Internal audits will be conducted at least annually to assess compliance with this policy.
2. External audits may be conducted as required by accreditation bodies or regulatory agencies.

6. Record Retention

All financial records, including budgets, invoices, receipts, reconciliations, and reports, must be retained for a minimum of **seven (7) years** in accordance with organizational policy and legal requirements.

7. Noncompliance

Failure to comply with this policy may result in disciplinary action up to and including termination, and may be referred to legal authorities in cases of fraud or theft.

XXVII. Digital Badge Policy & Procedure

(Aligned with ANSI/ASTM E2659-24 Standards)

1. Policy Statement

Optimus Education shall issue secure, verifiable digital badges to recognize learner achievement of certificate program requirements. Digital badges serve as an official representation of the certificate earned and may be shared electronically by the learner.

All digital badges will:

- Accurately reflect the scope and requirements of the associated certificate program.
 - Be issued only upon successful completion of all required coursework, assessments, and any other program-specific requirements.
 - Be secured against unauthorized issuance, duplication, or alteration.
 - Remain valid only for the duration of the underlying certificate's term.
-

2. Purpose

This policy ensures that digital badges are:

- **Authentic** – issued only to qualified individuals.
 - **Verifiable** – containing metadata that allows stakeholders to confirm authenticity and validity.
 - **Secure** – protected against unauthorized access or modification.
 - **Transparent** – clearly describing the achievement, issuing authority, and earning criteria.
-

3. Scope

This policy applies to all Optimus Education certificate programs in which a digital badge is offered as part of the learner recognition process. It covers:

- Creation, issuance, and invalidation of digital badges.
 - Badge metadata and verification requirements.
 - Security measures to protect badge integrity.
-

4. Definitions

- **Digital Badge** – A portable, verifiable electronic representation of a credential earned, including embedded metadata about the achievement.
 - **Badge Metadata** – The information embedded in the badge file, including issuing authority, date of issue, expiration date, criteria for earning, and verification link.
 - **Verification Platform** – The secure, third-party or internal system used to host and verify badges.
-

5. Roles & Responsibilities

5.1 Director of Programs

- Approves badge design and metadata requirements.
- Ensures badge issuance aligns with certificate program completion requirements.

5.2 Certificate Program Administrators

- Verify learner eligibility for badge issuance.
- Coordinate with the LMS or badge platform to issue badges.

5.3 IT & Security Team

- Maintain secure badge hosting and verification systems.
- Ensure platforms used for badge issuance meet security and privacy standards.

5.4 Learners

- Use and display badges in accordance with the Badge Use Guidelines (Section 9).
-

6. Issuance Procedure

1. Completion Verification

- Upon course and assessment completion, the LMS automatically generates a completion record.
- Certificate Program Administrator confirms all requirements have been met.

2. Badge Generation

- The LMS or authorized badge platform generates the badge with embedded metadata including:
 - Recipient name
 - Credential name (matching the certificate)
 - Issuing organization (Optimus Education)

- Date of issue
- Expiration date (if applicable)
- Unique badge ID and verification URL
- Summary of earning criteria

3. Badge Delivery

- The badge is emailed to the learner and stored in their LMS account for download or sharing.
- Learner receives instructions for displaying the badge on professional profiles, resumes, or email signatures.

4. Registry Update

- The learner's certificate and badge are recorded in the Optimus Education public verification registry within 3 business days of issuance.

7. Verification

- All issued digital badges shall be verifiable through:
 1. The public Optimus Education online registry.
 2. A direct verification link embedded in the badge metadata.
 - Verification data shall remain accessible for as long as the certificate is valid, plus a minimum of five years after expiration.
-

8. Invalidation

Badges will be **invalidated** under the following circumstances:

- The associated certificate expires or is **invalidated** for cause.
- Issuance error is identified (e.g., learner ineligible at time of issuance).

Invalidated badges will:

- Be marked as “Expired” or “**Invalidated**” in the verification registry.
 - Remain visible for historical purposes but clearly display the status change.
-

9. Badge Use Guidelines for Learners

Learners may:

- Display badges on social media, resumes, personal websites, and professional networking platforms.
- Share badges electronically with employers or licensing bodies.

Learners may not:

- Alter badge graphics or metadata.
 - Use badges in a misleading way that implies an endorsement or qualification beyond the scope of the earned credential.
-

10. Security & Data Protection

- Digital badges shall be issued through platforms using secure encryption and HTTPS protocols.
 - Badge metadata shall be locked against modification post-issuance.
 - Platforms must meet applicable privacy regulations, including GDPR and CCPA, when processing learner data.
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11. Recordkeeping

- Badge issuance and invalidation records shall be maintained in the LMS and/or badge platform indefinitely.
 - Metadata for each badge shall be stored in the Optimus Education database and linked to the learner's record.
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12. Review & Audit

- This policy shall be reviewed annually by the Director of Programs and COO.
- Badge issuance records will be audited quarterly to ensure compliance with ANAB ANSI/ASTM E2659-24 requirements.