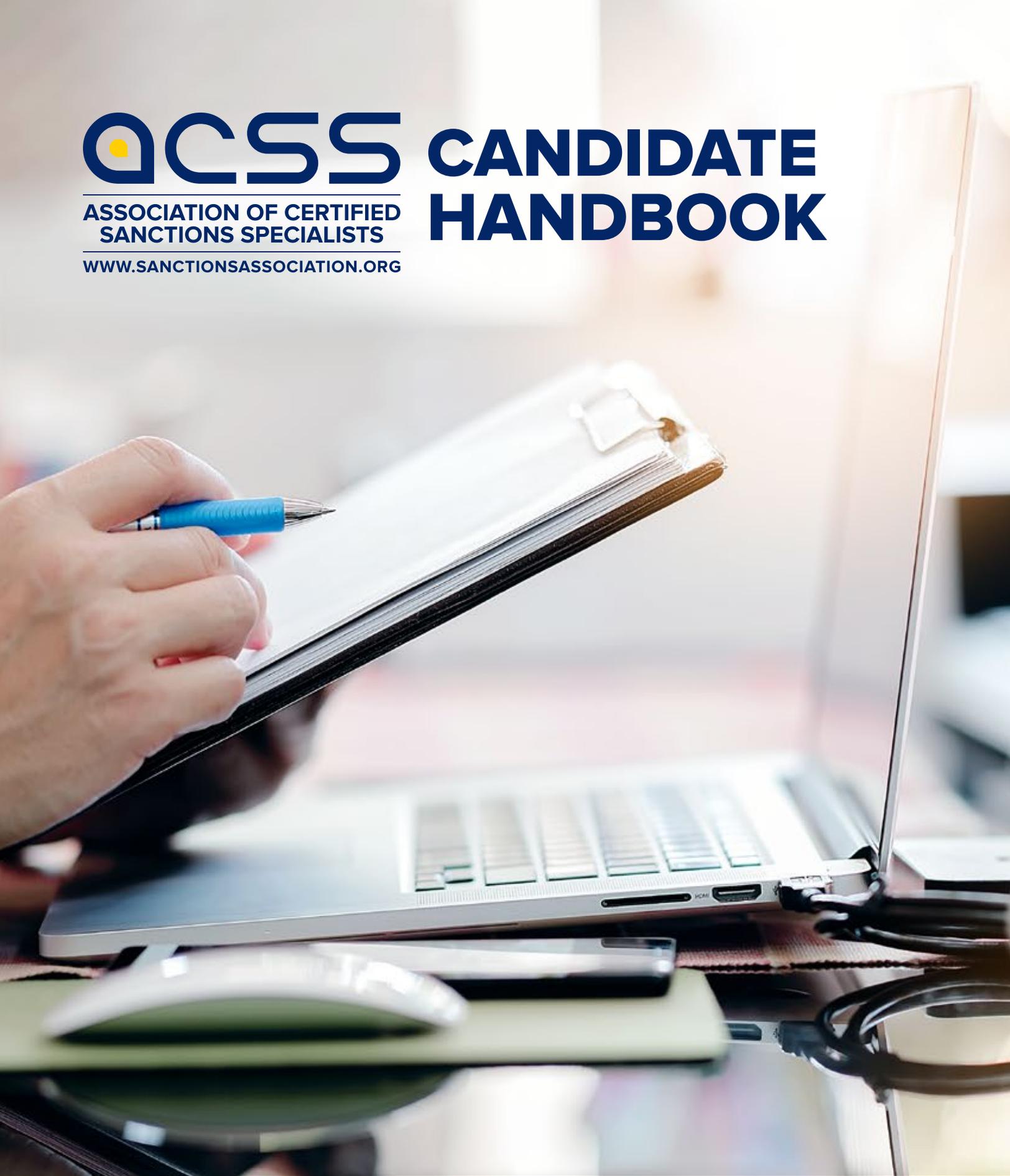




ASSOCIATION OF CERTIFIED
SANCTIONS SPECIALISTS

WWW.SANCTIONSASSOCIATION.ORG

CANDIDATE HANDBOOK



October, 2020

WHY EARN THE CSS CERTIFICATION?



Career opportunities abound for the sanctions specialists, but the days are over that just anyone can fulfill that role. Especially in these days, the “consumer” of the services of a compliance officer or other sanctions expert has become more vigilant, demanding quality. This demand is exacerbated by the media’s constant attention to sanctions issues arising at financial institutions, or international businesses. Certification of the sanctions professional in organizations that are vulnerable to the problem is designed to meet this consumer concern.

BENEFITS OF CERTIFICATION

For the certified sanctions specialist



Pride



Growth



Employment



Financial Rewards

For the employer



Reputation



Achievement

THE CSS CREDENTIAL

- **Demonstrates to regulators that your organization has specialized knowledge in the sanctions field.** CSS is the only sanctions-specific organization dedicated to training professionals in the sanctions industry.
- **Can help your organization minimize risk.** Having a CSS- certified team ensures that your team maintains a common level of sanctions knowledge.
- **Career Growth.** The exam preparation and continuing education required to maintain certification ensures your and your team’s skills remain sharp and their knowledge current.

ABOUT THIS HANDBOOK

This handbook provides information that you will need to register for the CSS Examination including eligibility requirements, policies, an exam content outline and application.

STATEMENT OF NONDISCRIMINATION

ACSS does not discriminate among candidates based on age, gender, race, color, religion, national origin, disability or marital status.

BACKGROUND VERIFICATION CHECK

ACSS reserves the right to conduct a background check, including a criminal records check, on all people wishing to take the CSS Examination. Candidates may be required to fill out a Background Verification Authorization Form. Candidates will receive correspondence from ACSS regarding the status of their application in the event ACSS performs a background check.

Please be advised that for the integrity of our association and its mission, in the event an individual is subject to a background check and does not pass, that individual will not be allowed to take the CSS Examination.



APPLICATION PROCESS

STEP 1

Check your eligibility. Use our [eligibility calculator](#) to check if you have the required number of points to qualify for the ACSS Exam.

To qualify you must:

1. Document a minimum of 40 qualifying credits based on education, other professional certification and professional experience in the field.
2. Submit supporting documents.
3. Provide three professional references.

Candidates who pass the CSS Examination and wish to use and display the CSS credential must also be active members of ACSS.

STEP 2

Check if you are a current ACSS Member. [Click here](#).

STEP 3

Purchase your CSS certification package. [Click here](#) to purchase now.

Examination Fee Schedule

CSS Package with Virtual Classroom Option:

Private sector \$1795

Public sector** \$995

Standard CSS Package (without Virtual Classroom):

Private sector \$1145

Public sector** \$695

** For individuals who work for the government.



ABOUT

THE CSS CERTIFICATION EXAM



The exam focuses on various aspects of the sanctions subject. A job analysis has determined the content and the importance of each knowledge area for the specialists in the field. The certification exam has been tailored to U.S. and international best practices and basic frameworks for sanctions efforts around the world.

- I Sanctions Regime Types, Goals, Prohibitions and Effects
- II Sanctions Imposers and Targets
- III Sanctions Evasion: Typologies and Schemes
- IV Essential Components of a Risk-Based Sanctions Compliance Program in Different Industry Settings
- V Role of Technology and List Screening
- VI Other Operational Issues Contributing to an Effective and Efficient Sanctions Compliance Program
- VII Enforcement and Conducting or Supporting Investigations into Sanctions Violations

LENGTH AND DURATION OF EXAM

The CSS examination consists of 106 multiple choice and multiple selection questions. All candidates have 3 hours to complete the exam. There is no penalty for guessing. Avoid leaving any questions unanswered to maximize your chances of passing. It is better to guess than to leave a question unanswered.

HOW TO APPLY

Applications can only be received online. [Click here to get started.](#) Payment may be made by credit card, personal check, cashier's check, money order or wire transfer (wire transfers must include identifying information). Checks should be made payable to ACSS. Prices are subject to change. Declined credit cards and/or returned checks are subject to a \$25 penalty.

Contact us with questions at:

+1.305.433 7187 or helpdesk@sanctionassociation.org

Candidates who pass the CSS examination and wish to use and display the CSS credential must have an active ACSS membership.

CSS EXAM PREPARATION

The CSS examination requires thorough preparation. Our certification program equips you with everything you need to properly prepare for the exam.

CSS STUDY GUIDE

The CSS Study guide is your main reference material and content source for preparing for the rigors of the CSS examination. Your success is determined by your comprehension of the material held within the study guide. The Study Guide is provided in an online PDF format and can be downloaded from the ACSS learning management system.

CSS VIRTUAL CLASSROOM

Candidates who need extra guidance and study structure may choose to enroll in the CSS Virtual Classroom. The Virtual Class provides a structured learning environment to candidates by dividing the study materials into six, 2-hour classes that meet once a week with an expert instructor by way of a live web-based interactive classroom. The CSS Virtual Classroom option sets candidates up for success through weekly homework assignments and required readings.

Visit www.sanctionsassociation.org to find out when the next class is in session.

Disclaimer: The practice questions contained in the study guide are not meant to indicate the exact style or difficulty level of the actual CSS examination questions. They are designed to help candidates review the content of the study guide.

TAKING THE CSS COURSE

INITIAL STEPS

Once you have been registered to the course you will like a link to the course landing page. The following are the steps:

STEP 1

Download the Candidate Handbook

STEP 2

Download Participant Guide

STEP 3

Download Exam Preparation Guide

STEP 4

(Optional) Register and attend six two hour virtual courses

READY TO TAKE THE EXAM

STEP 5

Download eligibility document

STEP 6

Obtain all supporting document to apply for the exam

STEP 7

Schedule you exam. This is a multiple step process.

- A. Click on the registration link
- B. Select the Exam type: physical testing facility or a Virtual Proctoring
- C. Verify your personal information. We use your address to determine locations and we use your name to verify it against a government issued identification.
- D. Upload supporting document

STEP 8

We will review your documentation. If everything is fine, the we send a message to our testing partner so they can communicate with you to take the exam.

Note: Your Examination Voucher will be valid for six months from the date of issue. During this period, you can take the exam, and a re-take if you are not able to pass it during it during your first attempt.

CSS EXAMINATION

BLUEPRINT

The CSS examination consists of seven domains. Below you will find the test objectives for each of the domains as well as the overall percentage weight of each domain.

I SANCTIONS REGIME TYPES, GOALS, PROHIBITIONS AND EFFECTS: 10-12%

- Articulate the definition and different types of economic/financial/trade sanctions regimes in order to be able to implement a sanctions compliance program.
- Describe the history and reasons why sanctions exist.
- Identify and describe the common prohibitions (facilitations), and common exemptions contained within sanctions regimes.
- Understand how to measure effectiveness of sanctions and unintended consequences of sanctions.

II SANCTIONS IMPOSERS AND TARGETS: 10-12%

- Understand the UN Security Council Sanctions architecture and mandate.
- Know how to read a UN Security Council Resolutions imposing a new sanctions regime.
- Understand the UN Security Council sanctions designation criteria for targets and the delisting process.
- Understand the EU sanctions/restrictive measures architecture and mandate.
- Know the different EU Sanctions Regimes.
- Articulate the main US agencies involved in sanctions, the roles they play in its enforcement, and its extraterritorial reach
- Identify and assess key other (UK, Australia, Japan, Canada) unilateral sanctions imposers and their regimes.

III SANCTIONS EVASION: TYPOLOGIES AND SCHEMES: 6-8%

- Articulate typologies and schemes set up to evade sanctions in the financial industry.
- Articulate typologies and schemes set up to evade sanctions in other industries such as maritime shipping, commercial insurance and others.

IV ESSENTIAL COMPONENTS OF A RISK-BASED SANCTIONS COMPLIANCE PROGRAM IN DIFFERENT INDUSTRY SETTINGS: 28-30%

A Management Commitment

- Obtain senior management commitment to and support of an organization's risk-based sanctions compliance program.

B Designing and Implementing a Sanctions Risk Assessment in Different Industry Settings

- Identify customer/product/geography related sanctions risks inherent within the applicable industry.
- Conduct and maintain a sanctions risk assessment for clients and customers, products and services, supply chain, intermediaries, counter-parties, transactions and geographic locations.

C Internal Controls: Policies and Procedures

- Develop policies and procedures based on industry leading practices.
- Analyze new government policies and regulatory and enforcement developments.

D Designated Sanctions Officer and Staffing

- Hire and oversee appropriate personnel with the right level of professional skills.

E Communication and Training

- Conduct training and develop awareness for stakeholders.
- Advise organization stakeholders.
- Supervise line-level personnel to ensure application of procedures using operational instructions and guidelines.



CERTIFIED SANCTIONS SPECIALIST'S **TESTING OPTIONS**

Our candidates have two options to take their CSS Exam. You can take it at a Physical Testing Facility or Remotely Proctored in the comfort of your house or office.

PHYSICAL TESTING FACILITY OPTION

Notification

If you have elected to take the exam on a physical testing facility, you will receive an email from our testing partner: Pearson Vue (Strasz). It will ask you to register to their testing site so you can select a physical location and one of the available date/time slots.

The email will include your credentials so that you can select a location and a time slot.

The link to register for the exam: <https://home.pearsonvue.com/acss>

Identification

Bring with you two forms of current and valid government-issued identification bearing a photograph and a signature. The name on the identification must match the name used during the CSS exam request link.

Identification Specifics

- The first and last name that the candidate uses to register must match exactly the first and last name on both of the IDs that are presented on test day. NOTE: During the test registration process you can ensure that your information is correct.
- Candidate is required to present two forms of original or valid identification: A primary ID (government issued with name, recent recognizable photo, and signature) and a secondary ID (with at least a name and signature, or name and recent recognizable photo).
- All IDs required must be issued by the country/region in which the candidate is testing. If the candidate does not have a qualifying primary ID issued from the country/region they are testing in, an International Travel Passport from their country/region of citizenship is required, along with a secondary ID.

Testing Center Procedures and Code of Conduct

There are no scheduled breaks and the candidate must request permission to leave the testing room.

No questions concerning the content of the exam may be asked during the testing period. It is the responsibility of each candidate to read the directions given on the computer and listen carefully to the instructions given by the proctor.

The proctor reserves the right to dismiss a candidate from the examination for any of the following reasons:

1. If a candidate gives or receives help or is suspected of doing so.
2. If a candidate attempts to remove examination materials or notes from the testing room.
3. If the candidate's admission to the exam is unauthorized.
4. If a candidate creates a disturbance, is abusive or is otherwise uncooperative.
5. If a candidate is discovered in possession of an electronic equipment.

Confidentiality

Candidates receive their exam results immediately (pass or fail) at the conclusion of the test. Results will not be given over the telephone, by facsimile, or electronic mail. When an organization pays the tester's examination, the organization may request from ACSS to release the result to the organization.

If the candidate does not want this information to be released to the organization, then the candidate must notify ACSS through the following email: membership@sanctionsassociation.org

Testing Cancellation Policy Regarding Your Exam Date

The registration to CSS course includes two testing opportunities.

Once you have registered for the exam, you can cancel your exam up to 72 hours of the testing date/hour of the exam at no cost by contacting the testing center.

A no-show count as one testing opportunity.

Appeals

ACSS provides an appeal mechanism for challenging denial of admission to the exam or revocation of the certification. It is the responsibility of the individual to initiate the appeal process by written request to ACSS within 30 days of the circumstance leading to the appeal.

A no show or failure of the exam does not constitute grounds for a review and appeal.

Pearson Vue Data and Privacy Policies

The following is the link to Pearson Vue's data and privacy policies please visit <https://home.pearsonvue.com/privacy>.



REMOTE PROCTORED TESTING OPTION

If you have elected to take the remote proctoring option you will get an email with our remote proctored testing partner Epic. For this option you have to provide the equipment.

Equipment Requirement

1. Mobile device: You will need a mobile phone on which you will download the ProctorExam app. Instructions for downloading the app will be provided during the system check process or you can do this prior to your system check by accessing the Google Play Store for Android devices and the App Store for iOS (Apple) devices and searching for ProctorExam. Specifications are:

- i. Android 4.1 or higher
- ii. iOS (Apple) 8.0 or higher
 - You can see your operating system version in the settings of your phone.
- iii. Video resolution must be minimum 800 x 600 px
- iv. Ensure you can connect to WiFi so you don't use up your data
- v. Ensure your mobile device can be plugged in for the duration of your exam

2. Notebook or Personal Computer.

- i. Operating Systems
 - Windows 7 or higher
 - MAC OS X
 - Linux 64-bit Ubuntu 14.04+, Debian 8+, openSUSE 13.3+, or Fedora Linux 24+
- ii. WiFi connection – candidate to be positioned where signal is strongest
- iii. Web Browser – Latest version of Google Chrome
- iv. Webcam required – maximum resolution of 1280 x 720
- v. Microphone required
- vi. Audio required

Note: Attempting to use a laptop or device that is intended for work purposes may have restricted access and admin rights installed. This may cause issues when trying to access the ProctorExam platform and therefore it is recommended to use a personal laptop.

Below are some links that we would recommend using to test the following work correctly before proceeding with your system check:

To check your microphone works
<https://www.onlinemictest.com/>

To check your webcam works
<https://www.onlinemictest.com/webcam-test/>

If you do find that your webcam or microphone does not work, please see the below links that will assist in fixing this:

- To allow microphone and camera [https://support.google.com/chrome/answer/2693767?co=GENIE.Platform%3D Desktop&hl=en](https://support.google.com/chrome/answer/2693767?co=GENIE.Platform%3D%20Desktop&hl=en)
- To allow mic and camera on MAC <https://support.apple.com/en-gb/guide/mac-help/mchlf6d108da/mac>
- To allow webcam on Windows 10 <https://www.howtogeek.com/394677/fix-my-webcam-doesn%E2%80%99t-work-on-windows-10/>

3. Internet Connectivity

- i. Bandwidth – Minimum 1Mbit/s upload speed. Tethering is not supported

Registration

Once registered to take the exam, an email for your system check and an email for your exam will be sent to you using the email address provided during registration. Please double check your junk email folder if nothing appears in your main inbox.

System Check

Your system check email will contain instructions on how to perform a system check to ensure your PC is set up and ready to go. However, before you perform your system check, we strongly advise you do the following:

- a. Ensure you are using the latest version of Google Chrome. To check if you have the latest version of Google Chrome:
 - i. On your computer, open Chrome
 - ii. Click on the icon in the upper corner that looks like three dots
 - iii. Click on help
 - iv. Click on about google chrome which will then show your latest version and if up to date or not
 - v. Click on the icon in the upper corner that looks like three dots
 - vi. Click Update Google Chrome. If you don't see this button, you're on the latest version
 - vii. Click Relaunch
- b. Allow pop-ups for ProctorExam:
 - i. Type `chrome://settings/content` in to the address bar and press Enter
 - ii. Select Pop-ups from the Content Settings screen
 - iii. In 'Allow', click 'Add' and enter <https://surpass.proctorexam.com>
 - iv. Close the Content Settings screen and refresh your browser to enable Flash
- c. Install ProctorExam extension/plugin within Chrome to allow screen sharing:
 - I. Go to the link below down download the Chrome extension.
<https://chrome.google.com/webstore/detail/proctorexam-screen-sharin/digojkgonhgmnohbapdfjllpnmjmdhpg>
<https://chrome.google.com/webstore/category/extensions>
and Search for ProctorExam Screen Sharing
 - Click on 'add to chrome'
 - Click on 'add extension'

Please ensure you run your system check as soon as possible to avoid any unwanted problems just before your exam. Once you click on the system check link, you'll be given simple instructions on how to complete the check.

Taking the Exam

- a. Once your system check is completed, another email will be sent prior to your exam date – again, please check your junk email folder. This email contains the link to your exam.
- b. For the exam, you will need to use your mobile phone because this provides additional coverage of the test taking environment. As described above, you will need an Apple or Android mobile device with the ProctorExam app installed.
- c. At the time you are due to take your exam, simply click on the exam link in your email, follow the ID, environment instructions and read in full the 'Instructions for Candidates' then launch your exam.
- d. When you are in the instance of Surpass you will need to enable flash in the Chrome browser. You will require Adobe Flash Player 18 to 28.0.0.161:
 - I. You will be presented with the following on screen 'This page requires flash, select here to enable flash content'
 - II. Click on here
 - III. Click on 'Allow' which will then appear in the top left of the screen
- e. Once you've completed the exam, please ensure you click on 'Finish' in Surpass, and then click on 'Finish Exam' in ProctorExam.

Support during your exam

During your system check and on exam day, if you encounter any technical difficulties, you will be able to access online chat support. You will find this in the bottom right hand corner of your screen.



At the end of your exam

Once you have completed your exam in Surpass, to fully close the ProctorExam environment please click on the 'finish exam' button in the top right of the screen as shown below. This will ensure this does not continue to run should you pull down your laptop screen to close it.

ProctorExam Chrome Extension

The ProctorExam Chrome extension will remain installed in your Chrome browser at the top right-hand side indicated by an icon as shown here



In order to remove this once your exam has been completed, right click on the icon and then click on 'remove from chrome'. The extension will now be removed.

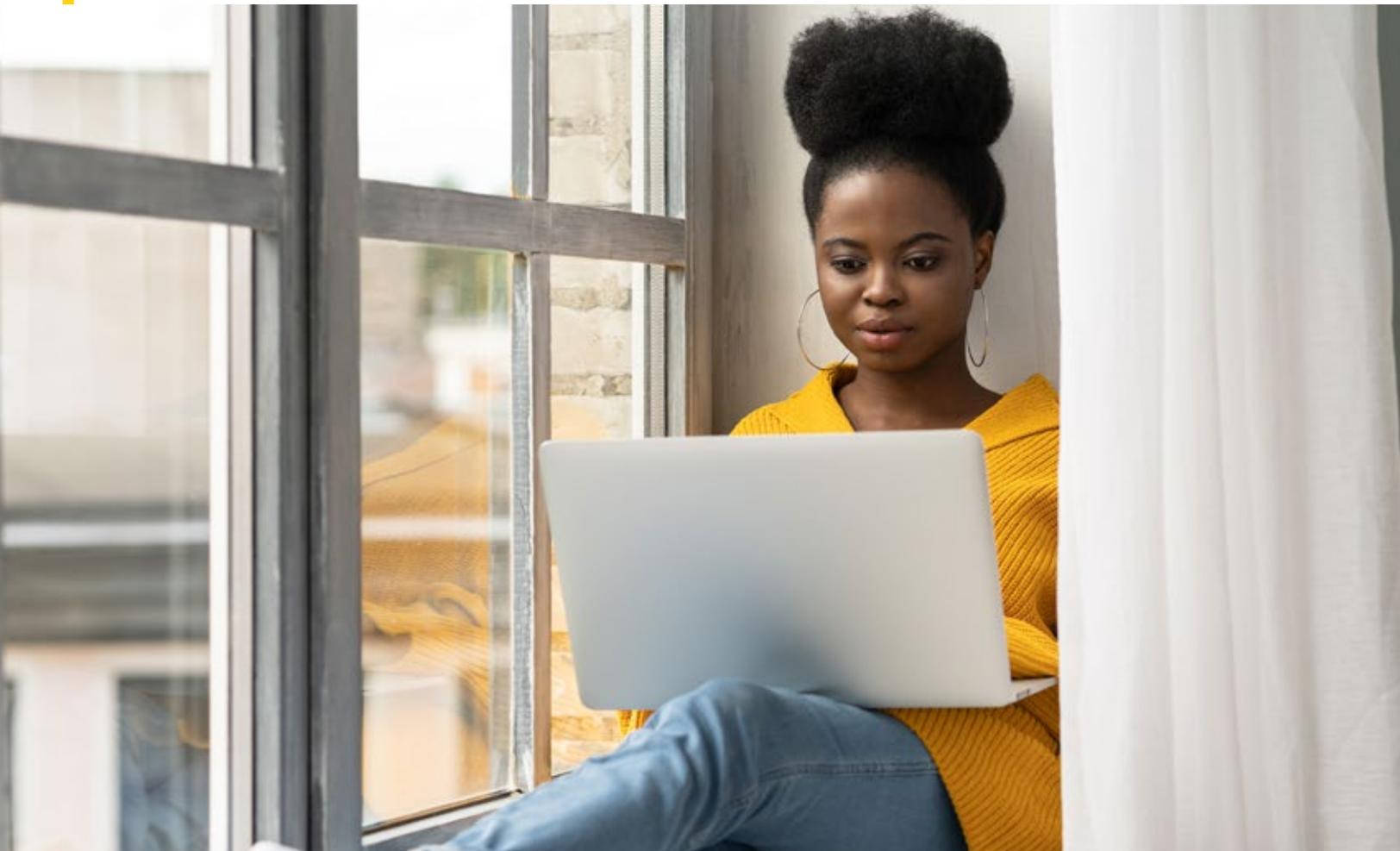
Please note: if you have multiple exams to take or have exams to take in future sessions, you will need to re-install the Chrome extension if it is removed. However, you can keep the extension installed until all exams have been completed.



PROCTOREXAM



Available in the
Chrome Web Store



THE DAY OF THE EXAM

AND TESTING CENTERS RULES

ADMISSION POLICY

Please arrive at the test center 30 minutes before your scheduled appointment at the Pearson Vue testing center. This will allow you enough time to complete the check-in procedures before beginning your exam. You will be required to show two (2) forms of personal identification. Both forms must contain your signature, and at least one form must contain your photo. If you arrive more than 30 minutes after your appointment time and are refused admission, the exam and delivery fees are not refundable.

IDENTIFICATION

You are required to present two forms of original (no photo copies), valid (unexpired) IDs; one form as a primary ID (government issued with name, photo and signature) and one form as a secondary ID (with name and signature or name and recent recognizable photo). The first and last name that you used to register must match exactly the first and last name on the ID that is presented on test day. All IDs required must be issued by the country in which you are testing. If you do not have the qualifying ID issued from the country you are testing in, an International Travel Passport from your country of citizenship is required, along with a secondary ID. If you have any questions or concerns about the ID you are required to bring with you to the testing center for admittance for your exam please contact Pearson VUE customer Service at www.pearsonvue.com/contact. To view the full ID policy, including any additional allowances to this policy, please visit <http://www.pearsonvue.com/policies/IS.pdf>.

Candidates may NOT bring in any printed reference material.

No personal items may be taken into the testing room. This includes all bags, books not authorized by the sponsor, notes, phones, pagers, watches and wallets.

EXAMINATION PROCEDURES AND CODE OF CONDUCT

You will have three hours to complete the exam. Additional time will not be allowed. There are no scheduled breaks. Candidates must have the permission of the test center proctor to leave the testing room.

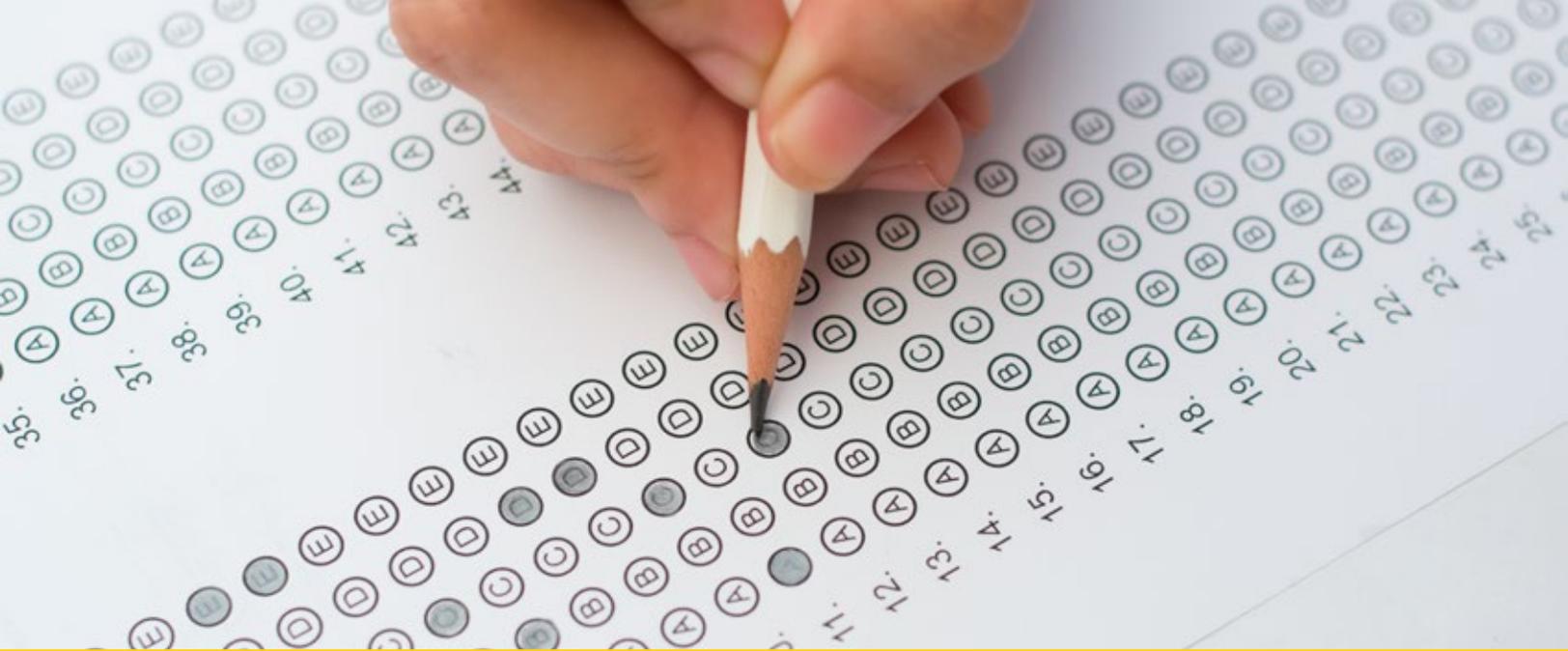
No questions concerning the content of the exam may be asked during the testing period. It is the responsibility of each candidate to read the directions given on the computer and listen carefully to the instructions given by the proctor.

For more information, check here: <https://home.pearsonvue.com/acss>

The examination performance of all candidates is monitored and may be analyzed statistically for purposes of detecting and verifying any form of cheating. If it is determined that a score has questionable validity, after appropriate review, the score will be marked as invalid and the candidate may be barred from retesting indefinitely or for a period as determined by ACSS.

RESCHEDULE AND CANCELLATION POLICY

If you wish to reschedule or cancel your exam without an additional fee, you must contact Pearson VUE at least 72 hours prior to your scheduled appointment. Exams cannot be rescheduled less than 72 hours prior to your appointment. Missing your exam will result in forfeiting all exam fees. **NOTE:** During your time period you have two attempts to take the exam.



EXAM RESULTS

Candidates receive their exam results immediately (pass or fail) at the conclusion of the test. This information is only released to the candidate at the testing center. Results will not be given over the telephone, by facsimile, or electronic mail. When an organization pays for an individual's examination, the organization may request ACSS to release the result to the organization. If a candidate does not want this information to be released to the organization, then the candidate must notify ACSS in writing.

ACSS posts a list of certified members on www.sanctionsassociation.org

RETAKE THE EXAM

If a candidate does not pass, they will have the opportunity to retake the examination a 2nd time.

If the candidate allows the one-year time period to expire without taking the exam, must apply for re-examination. The applicant must resubmit their full application, documentation of eligibility and examination fee.

A candidate is not allowed to take the examination more than three consecutive times; there are no exceptions allowed. The waiting period to retake the examination after the third consecutive attempt is 6 months.

To schedule a re-take, the candidate must:

1. Contact ACSS at helpdesk@sanctionsassociation.org or +1 305.433 7187
2. Pay the examination fee to receive their new Voucher Code:
 - a) \$249 for Private members
 - b) \$149 for Public members
3. Reschedule their exam through the test delivery website.

APPEALS

ACSS provides an appeal mechanism for challenging denial of admission to the exam or revocation of the certificate. It is the responsibility of the individual to initiate the appeal process by written request to ACSS within 30 days of the circumstance leading to the appeal. Please note: Failure of the exam does not constitute grounds for a review and appeal.

SPECIAL ACCOMMODATIONS

Please contact ACSS if you have a disability covered by the Americans with Disabilities Act so your accommodations for testing can be processed efficiently.

CSS RECERTIFICATION

POLICIES

RECERTIFICATION REQUIREMENTS

In order to recertify the CSS credential, you must meet the following requirements:

- 1 Maintain an active CSS membership.
- 2 Meet the Continuing Education credit requirements.
- 3 Submit an online application with the appropriate renewal fees.

CONTINUING EDUCATION CREDIT REQUIREMENTS

- A total of 60 continuing education credits must be accumulated within a three-year cycle. These can be sanctions or export controls related courses from ACSS, internal training, or other providers.
- Applicants will not be granted continuing education credits for activities completed prior to obtaining their CSS credential or their most recent recertification.
- Additional credits earned past the required 60 cannot be rolled over to the following cycle.
The deadline for earning continuing education credits is December 15 of the year of your recertification.

DEADLINE FOR CSS RECERTIFICATION

Recertification applicants are required to submit both a completed CSS Recertification Application and the associated fees no later than December 15 of the third year after receiving their initial certification or their most recent recertification.

A late fee of US\$50 will be applied to all applicants who miss the December 15 deadline and will be accepted for only 90 days after the deadline.

DOCUMENTATION

Applicants do not need to include supporting documentation along with the recertification application; however, they are advised to retain original copies of their supporting documents in their files in the event that ACSS should find it necessary to audit their records.

RECERTIFICATION AUDIT

The ACSS audit process ensures that ACSS certified individuals have complied with their recertification requirements. Audits are performed regularly. ACSS will notify selected audit candidates advising them of the processes.

RECERTIFICATION FEES

| | | |
|------------------------------|----------|--|
| Early Application Fee | US\$ 200 | Application and fee received by ACSS no later than October 1 |
| Regular Application | US\$ 250 | Application and fee received by ACSS no later than December 15 |
| Late Application | US\$ 300 | Application and fee received by ACSS no later than March 31 |

ACSS will not accept late recertification applications postmarked after March 31. Fees can be paid by credit card.



**ASSOCIATION OF CERTIFIED
SANCTIONS SPECIALISTS**

WWW.SANCTIONSASSOCIATION.ORG

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