

CHARACTERISTICS OF CLERY COMPLIANCE OFFICERS AT NACCOP MEMBER INSTITUTIONS: 2021 UPDATE







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At the eighth annual conference of the National Association of Clery Compliance Officers and Professionals (NACCOP), we released the results of a survey launched in January 2021 to update the baseline data collected in 2017 concerning Clery compliance officers and professionals working at NACCOP member institutions. The 2021 data collection included additional inquiries related to member institutions' response to the global COVID-19 pandemic. This whitepaper provides a summary of the results we obtained from analyzing our second membership survey data related to characteristics of Clery compliance officers and professionals at NACCOP member institutions.

BACKGROUND

In mid-January 2021, NACCOP distributed a survey to the primary institutional member from each of NACCOP's 549 member institutions. The number of member institutions had increased by 184 since NACCOP previously conducted this same survey distribution process for its inaugural survey in late November 2017. The primary institutional member received instructions informing them that the survey was intended to be completed by the person who serves as the institution's Clery Compliance Officer (CCO), regardless of the person's formal or working titles or whether the CCO has been formally designated at the institution. Only one response was to be submitted per institution. To that end, the institutional NACCOP member was advised that they may forward the survey to another professional member, but only one member (the CCO, or the person acting in that capacity) should complete the survey on behalf of the institution. Furthermore, the primary institution member was advised that they should not report information for multiple employees. Instead, if more than one person has been assigned responsibility for coordinating an institution's compliance with the Clery Act, institutional members were advised to provide data pertaining to the person with primary responsibility for Clery compliance functions.

The inaugural survey in 2017 created a baseline understanding of characteristics of Clerv compliance officers at NACCOP member These characteristics included institutions items such as titles, reporting structures, and educational and training backgrounds. Additional data related to the salary of CCOs helped determine whether there were any significant differences in salary based upon data collected in the survey. The 2021 survey sought much of the same information as the 2017 data collection. but it added new questions to explore how member institutions responded to the global COVID-19 pandemic.

NACCOP, with the assistance of its newly formed Research Committee, developed new survey questions utilized in the 2021 survey. Where institutional demographic questions were asked, respondents were encouraged to look up pertinent characteristics using the U.S. Department of Education's "College Navigator"³ as well as the institution's Carnegie "Basic" classification and the "Size and Setting" as reported by the Carnegie classification of Institutions of Higher Education.⁴

The survey remained open from January 2021 through February 2021. One hundred forty-seven usable responses were received, for a response rate of 26.8%. Although not every survey respondent answered every question, all usable responses were included in all statistical calculations.⁵ The specific percentages and number of responses for each item discussed in this whitepaper will be identified.



INSTITUTIONAL CHARACTERISTICS

Sixty-seven percent (n=98) of respondents reported that their CCOs are employed at public institutions. CCOs who worked at private institutions comprised 32% of respondents (n=48).

The majority of respondents were from four-year institutions (83%, n=122) whereas only 16% were from two-year or less than two year institutions (n=24). The vast majority of respondents (88%, n=130) worked at not-for-profit institutions of higher education.

A preponderance of respondents were employed in a campus setting of a city (63%, n=93) whereas the remaining respondents worked in either a suburban (16%, n=24), town (14%, n=20), or rural (6%, n=9) setting. A plurality of respondents indicated the total student enrollment at their institution was fewer than 10,000 students (50%, n=68). A specific breakdown of total student enrollment by the 137 respondents answering this question is included in the table below.

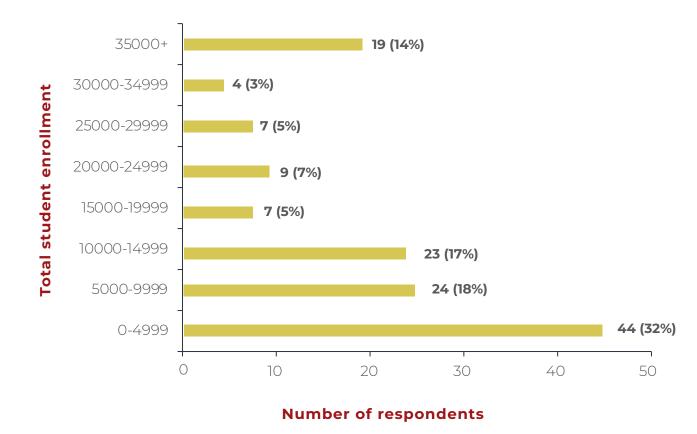


Table 1. Total Student Enrollment among NACCOP Member Institutions

With respect to institutional demographics under the Carnegie Basic Classification system, slightly more than 60% of the 136 institutions responding to this question indicated they offer graduate programs (n=90), with 36% reporting their classification as Doctoral Universities (n=53) and 25% (n=37) identifying as Master's Colleges and Universities. Thirteen percent (n=19) indicated their institutions are Baccalaureate Colleges, whereas only 15% (n=22) identified their institutions as Associate's Colleges. Three percent (n=5) identified as being from Special Focus Institutions.

CHARACTERISTICS OF CCO

When asked whether the respondent's institution formally designated a CCO, through appointment or hiring, incorporation of CCO duties into a position description, or other clear means of designating a CCO, 70% of respondents (n=102) indicated their institutions had made such a designation. The remaining 30% (n=43) indicated their institution had made no such formal designation, but they had someone who serves informally in the capacity of CCO.

A new inquiry in the 2021 survey asked respondents to select from a list the rank or title most closely aligned with the current CCO's position level. Forty percent (n=59) selected "Coordinator/ Administrator/Professional/Officer" as the title most closely aligned with their position while 29% (n=42) selected "Chief/Director/Executive Director". Five percent (n=7) chose "Asst. Chief/Deputy Chief/ Asst. Director/Assoc. Director". Those selecting titles within the traditional police/public safety hierarchy included four percent (n=6) Captain, five percent (n=8) Lieutenant, two percent (n=3) Sergeant, and one percent (n=2) Police/Public Safety Officer.

Table 2. Sample of Position Titles Among Individuals Serving as the Institution's CCO

Director of Clery Compliance	Clery Act Compliance Coordinator
Director of Compliance	Clery Compliance Coordinator
Director of Investigation, Compliance & Training	Clery Act Coordinator
Director of Investigation, Compliance & Training	Clery Coordinator
Director, Title IX and Clery Compliance	Compliance Coordinator
Director, Campus Safety & Compliance	Coordinator of Compliance
Clery Act Compliance Program Manager	Clery Compliance Officer
Clery Act Compliance Officer	Clery Compliance Administrator
Compliance Officer	Clery Compliance Lieutenant
Associate Director of Clery Compliance Training	



Only four percent (n=6) and one percent (n=2) identified as Asst./Assoc. Vice President and Vice President/Senior VP/Executive VP, respectively.

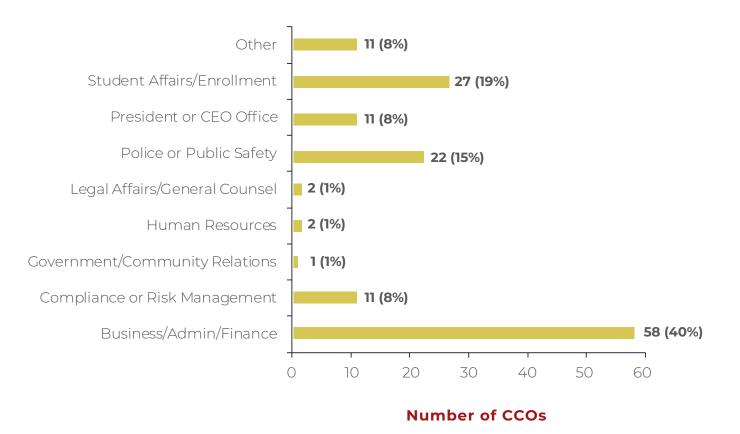
REPORTING STRUCTURES

Respondents were asked whether the CCO directly reported to someone in the campus police/public safety/security department. Sixty-eight percent (n=100) indicated they reported to this department whereas 32% (n=47) indicated the CCO reported to another unit outside the campus police/public safety/security department. (In the 2017 data collection, 77% of survey respondents indicated they reported to the campus police/ public safety/security department).

Of the sub-set of respondents who indicated the CCO reports directly to the campus police/ public safety/security department, respondents were asked to indicate to whom the CCO reports. Seventy-six percent of CCOs reported to either a Chief/Director (52%, n=52), Assistant or Associate Vice President (8%, n=8), or Vice President or equivalent title (16%, n=16).

Among those CCOs who report to a unit outside of the campus police/public safety/security department, 90% reported to positions of Director or higher, with 9% reporting to a Director (n=4), 2% reporting to an Executive Director (n=1), 9% reporting to an Assistant or Associate Vice President (n=4), 53% reporting to a Vice President or equivalent (n=25), 4% reporting to a Chief Operating Officer (n=2), and 13% (n=6) reporting to the President/Chancellor of the institution. Beyond the CCO's immediate supervisor, the survey asked in which administrative division is the CCO housed. Initially, respondents were given the following response options: Administrative Affairs, Business/ Finance, Student Affairs/Student Engagement/Enrollment Services, Legal Affairs/General Counsel, President's/CEO's Office, Human Resources, Compliance/Risk Management, Police or Public Safety, Provost/ Academic Affairs, University Communications/ Public Relations/Marketing, Government/Community Relations, and Other (please specify). No CCOs indicated they report to any of the following divisions: Provost/ Academic Affairs or University Communications/Public Relations/Marketing, but 8% (n=11) selected "Other" from the possible choices. The breakdown of responses is provided in Table 3.

Table 3. Administrative Division to Which CCO Reports



The survey also asked CCOs to indicate how many levels beneath the President or CEO of the institution the CCO sits. For example, if the CCO reports to the Chief of Police, and the Chief of Police reports to the Vice President of Finance & Administration, who reports to the President, CCOs were prompted to select "3." The median number of levels beneath the President or CEO was 3 (with 1 level being the least, and 6 levels being the most). This result mirrored the findings in the inaugural survey.

RESPONSIBILITIES AND CHARACTERISTICS OF CCO

Respondents were asked whether Clery compliance duties are the CCO's primary job responsibility (i.e., whether the Clery-related functions of the CCO's position comprise the largest percentage of the CCO's job duties). Fifty-six percent (n=82) indicated Clery compliance duties were secondary, whereas 44% (n=65) indicated they were primary. Respondents were also asked to indicate what percentage of the CCO's job duties pertain to Clery compliance. The results are presented in Table 4.

Table 4. Percentage of CCO Duties Related to Clery Compliance

Reported Percentage	Frequency	Cumulative %
Less than 5	3	2%
5	4	5%
10	7	10%
15	7	14%
20	12	22%
25	10	29%
30	9	35%
35	6	39%
40	5	43%
45	3	45%
50	19	58%
55	1	59%
60	8	64%
65	3	66%
70	4	69%
75	10	76%
80	2	77%
85	3	79%
90	8	84%
95	6	88%
100	17	100%

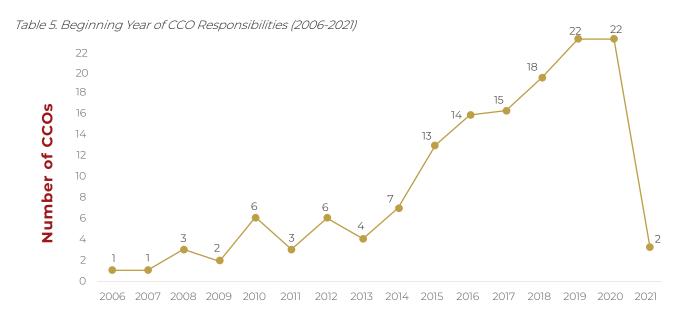
As Table 4 demonstrates, 76% of respondents (n=111) had 75% or less of their duties devoted to Clery compliance activities; 58% (n=85) had 50% or less of their duties devoted to Clery compliance activities; and 29% (n=43) had 25% or less of their duties devoted to Clery compliance activities.

CCOs were also asked how many hours per week they are scheduled to work. Here, 89.8% (n=132) reported being scheduled for 40 hours per week, whereas 6.8% (n=10) were scheduled 30 to 39 hours per week and 3.4% (n=5) were scheduled 29 or fewer hours per week. One hundred percent (n=147) reported being employed all 12 months of the year.

Other highlights from the survey show that:

- Fourteen percent (n=20) of CCOs from responding institutions were performing CCO duties on an acting or interim basis at the time of the survey, whereas 86% (n= 127) were not.
- Sixteen percent (n=24) of CCOs reported being eligible for overtime (i.e., the CCO is a non-exempt employee) whereas 84% (n=123) reported being ineligible for overtime (i.e., the CCO is an exempt employee).
- Seven percent (n=11) of CCOs were members of a collective bargaining unit whereas 88% (n=129) were not. The remaining 5% (n=7) of respondents indicated they were uncertain whether the CCO was a member of a collective bargaining unit.

Respondents were asked to indicate the year in which the CCO began their CCO-related responsibilities at the institution. Of the 146 who responded, only 3% of members (n=5) began their responsibilities before 2006 while 44% (n= 64) began their responsibilities since 2018. Since 2013 (the year in which the Violence Against Women Act [VAWA] Amendments to the Clery Act were signed into law), 80% of CCOs began their CCO-related responsibilities (n= 117). Notably, 64% of CCOs began their CCO-related responsibilities at the institution in 2016 or later (n=93), which means most CCOs have only known the 2016 Handbook. Table 5 shows a detailed breakdown of the number of CCOs who indicated they began their CCO-related responsibilities each year since 2006.



The survey also sought to understand the educational levels of CCOs. Specifically, the survey asked respondents to identify the highest level of education completed by the CCO. Table 6 provides a detailed breakdown of responses.

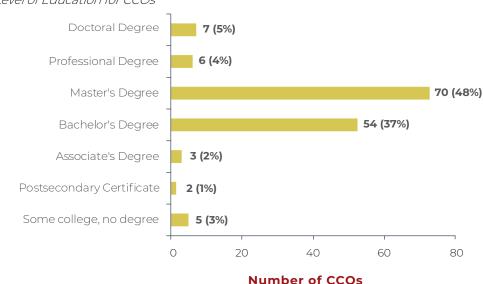


Table 6. Highest Level of Education for CCOs

As Table 7 shows, 57% of CCOs represented in the survey (n=83) possessed a graduate degree (master's, professional, or doctoral). Of the remaining CCOs, 40% (n=59) possessed an undergraduate degree or certificate.

The survey asked respondents whether the CCO was designated as a Campus Security Authority (CSA) of the institution. In total, 95% (n=140) indicated the CCO was designated as a CSA of the institution.

Of the sub-set of respondents indicating the CCO of their institution is a CSA, 73% (n=102) indicated the CCO is a CSA because they worked in the campus police/public safety/security department. Only 5% (n=7) indicated the CCO is a CSA because the CCO is an individual responsible for campus security, but the CCO does not work for the campus police/security department. The remaining reasons cited for the CCO being a CSA were that the CCO is an official of the institution with significant responsibility for student and campus activities (12%, n=17), or because the CCO is listed in the Annual Security Report as an individual to which students and employees should report criminal offenses (10%, n=14).

TRAINING OF CCOS

The survey asked respondents to identify the Cleryfocused training(s) in which the CCO participated in since 2015. Respondents were provided several choices, to include both campus-based trainings and national training courses offered by D. Stafford & Associates, enrollment in the NACCOP Clery Compliance Officer Certification Program, attendance at NACCOP conferences, attendance at in-person NACCOP classes, participation in the NACCOP webinar series, and participation in courses offered by the Clery Center. An "Other" option was also provided to respondents to identify other in-person or virtual trainings in which the CCO participated since 2015. The advertised number of hours for each training were used to compute the number of hours of training received.

The median number of training hours reported among the 147 respondents answering this question was 44 (the equivalent of 5.5 days of training, up 1 full day of training since the 2017 data collection).⁶

However, we note that the format of the question did not allow respondents to indicate if they attended one of these trainings multiple times. Notably, 97.28% (n=143) of CCOs have participated in at least some training since 2015, whereas only 2.72% (n=4) participated in no training during that timeframe. This is an improvement over the 2017 survey, at which time 17% (n=20) of respondents reported participating in no training regarding the Clery Act. Twenty-seven percent (n=39) of CCOs at member institutions responding to the survey were certified through the NACCOP Clery Compliance Officer Certification Program, which launched in 2016.

CCO SALARIES

As in the inaugural survey, we collected salary information among CCOs in the 2021 survey. Specifically, respondents were prompted to disclose the CCO's annual base salary, rounded to the nearest U.S. dollar amount, as of November 1, 2020. Three of the 147 usable responses to the survey left this question blank.

Among those who responded, salaries ranged from \$28,000 to \$158,000 with a reported mean salary of \$75,773.97(SD = \$26,255.34) (mean in 2017 was \$69,034). The median reported salary was \$72,250.00 (median was \$68,000 in 2017) and the mode was \$75,000. As compared to the 2017 data, the mean salary increased by \$6,739.97 and the median salary increased by \$4,250. It should be noted that the data has not been adjusted for inflation.

Among the variables collected in this survey, the following factors showed statistical significance in both the inaugural and current survey as related to the differences in CCO salary:

- Salary was higher among CCOs who did not report to the campus police/public safety/ security department (*M* = \$84,431.78, *SD* = \$26,127.33) than it was among CCOs who reported to that entity (*M* = \$71,838.61, *SD* = \$25,481.82). The difference between these average salaries is \$12,593.17, a small increase of \$1,164.50 since the 2017 survey.
- Salary was higher among CCOs whose Clery compliance duties were not the CCO's primary job responsibility (*M* = \$83,020.70, *SD* = \$28,093.59) as compared to CCOs for whom Clery-related duties were primary (*M* = \$66,715.56, *SD* = \$20,614.60). The difference between these average salaries remained relatively unchanged from the inaugural survey at \$16,305.14, a small decrease of \$113.52 since 2017.
- Salary was higher among CCOs who are not eligible for overtime (M = \$80,340.57, SD = \$25,617.55) compared to CCOs who are eligible for overtime (M = \$52,941.00, SD = \$15,416.70). The difference between these average salaries is \$27,399.57, a decrease of \$1,975.50 from the 2017 findings.

Additional salary-related inquiries posed to respondents in this latest survey allowed for updated findings when compared to the inaugural survey.



- · Salary was highest among CCOs who possessed a Graduate or Professional Degree (*M* = \$82,041.84, *SD* = \$26,093.75) as compared to CCOs whose highest level of education was that of Undergraduate Degree or Certificate (M = \$68,980.76, SD = \$24,613.86) or who had no postsecondary education (M = \$55,648.00, *SD* = \$20,955.18). The difference between the average salary of CCOs with a Graduate or Professional Degree relative to an Undergraduate Degree or Certificate in this survey is \$13,061.08. The gap between these two average salaries is \$608.29 less than it had been in 2017. The current survey showed the difference between the average salary of CCOs with a Graduate or Professional Degree relative to those CCOs with no formal postsecondary education decreased by \$2,867.41 from \$29,261.25 in 2017 to \$26,393.84 in 2021.
- · Salary varied by the setting in which the main campus of the institution was located (city, suburb, town, or rural setting). Salary for CCOs whose main campus was in a city (M =\$77,824.75, SD = \$27,954.71) was significantly larger than for CCOs whose main campus was located in a rural setting (M = \$57,666.67, SD= \$20,988.09). The difference between these average salaries is \$20,158.08. The results also showed that CCOs who are employed at institutions with a rural setting (M = \$57,666.67, *SD* = \$20,988.09) make significantly less than CCOs who are employed at an institution with a main campus located in a suburban setting (*M* = \$80,805.22, *SD* = \$22,539.46). The difference between these average salaries is \$23,138.55. Although the data has not been adjusted for inflation, it is interesting to note that while the average salaries in the city and suburb settings reported in the inaugural survey increased by \$6,879.67 and \$5,995.87 respectively, the average salary in the rural setting increased by \$11,738.10. No other significant differences were found among campus setting types.

• As in the inaugural survey, we found a statistically significant positive correlation between the total student enrollment of the institution and salary ($r_s = 0.28$, p = .001). However, the correlation coefficient between Annual Base Salary and Total Enrollment was 0.28, which indicates a small effect size. This means that as Total Enrollment increases, Annual Base Salary also tends to increase slightly.

· Finally, when the percentages of the CCO's job duties that pertain to Clery compliance were binned into 20% increments (i.e., 1%-20%, 21%-40%, 41%-60%, 61%-80%, and 81%-100%) the average salary of CCOs whose Cleryrelated job duties were between 1%-20% had significantly higher salaries (M =\$95,814.79, SD = \$30,053.53) than those whose Cleryrelated job duties were between 81%-100% (M = \$70,427.61, SD = \$18,528.52). The difference between these average salaries is \$25,387.18. Additionally, the average salary of CCOs whose Clery-related job duties were between 1%-20% had significantly higher salaries (M =\$95,814.79, SD = \$30,053.53) than those whose Clery-related job duties were between 41%-60% (*M* = \$65,919.00, *SD* = \$25,214.26). The same statistical significance was detected when comparing average salaries of CCOs whose Clery-related job duties were between 1%-20% with 21%-40%: the average salaries of CCOs with Clery-related job duties between 21%-40% were significantly lower (M =\$73,967.79, SD = \$24,251.46) than those whose Cleryrelated job duties were between 81%-100% (M = \$70,427.61, SD = \$18,528.52). No other significant effects were found among groups of binned Clery-related job duties. Table 6 shows the average salary for each percentage bin from each survey year.

Table 6. CCO Average Salaries by Clery-related Job Duties

Percentage Bin	Survey Bin	Average Salary	Number of CCOs in Bin
1%-20%	2017	\$76,053.62	21
	2021	\$95,814.79	33
21%-40%	2017	\$78,448.17	29
	2021	\$73,967.79	29
41%-60%	2017	\$62,589.00	21
	2021	\$65,919.00	30
61%-80%	2017	\$62,754.71	14
	2021	\$68,569.32	19
81%-100%	2017	\$60,071.82	22
	2021	\$70,427.61	33

THE GLOBAL PANDEMIC AND CCO

The 2021 survey provided an opportunity to explore how measures taken by member institutions to respond to the global pandemic may have affected CCOs. We inquired of respondents whether the member institution's pandemic response included the CCO being furloughed for any period of time. For survey purposes, furlough was defined as a mandatory unpaid leave of absence wherein the CCO was eligible to seek unemployment benefits from state in which the CCO was located. Of the 147 CCOs responding, 6% (n=9) reported being subject to furlough. The average number of days furloughed for CCOs was 22.2. The range of days furloughed spanned from a minimum of 2 days and a maximum of 100 days.

Interestingly, a survey released by the American Association of University Professors (AAUP) in April 2021 showed that "nearly 60 percent of colleges said they imposed a salary freeze or salary reduction, and nearly one in 10 furloughed at least some faculty members."⁷ In our survey, CCOs fared slightly better than some faculty.

In addition to furloughs, member institutions may have opted to freeze salaries and spending. To that end, this survey also gathered data related to whether CCOs had budgets (separate from salary and benefits) for training and compliancerelated efforts prior to the pandemic. Seventy-seven percent (n=113) did not have such a budget while 23% (n=34) did. Of the 34 respondents who had such a budget, 18% (n=6) reported that the pandemic led to a decrease in that budget. The average decrease in these budgets was 33.83%. The lowest decrease measured 10% while the highest was 60%. Notably, the average pre-pandemic budget was \$14,934.22 (the mode was \$10,000 and the median was \$9,000).

This survey also sought to gather data related to the pandemic's effect on the base salary of CCOs. Respondents were first asked if their base salaries were affected by the pandemic on or before November 2, 2020. Of the 146 respondents to this question, 92% (n=135) reported no pandemicrelated effect on their base salaries whereas 7% (n=10) reported an increase. One percent (n=1) reported a pandemic-related decrease in base salary. The average increase was \$10,000 while the average decrease was \$5,974.82.

An additional inquiry asked respondents if their base salary was affected by the pandemic after November 2, 2020. Of the 147 respondents to this question, 96% (n=141) experienced no pandemicrelated effect on their base salary after November 2, 2020, while 3% (n=4) reported an increase. One percent (n=2) reported a pandemic-related decrease in base salary after November 2, 2020. The average increase was \$4,625.00 and the reported decrease was \$6,137.50.

CONCLUSION

The data reported here provides updated data among Clery compliance officers and professionals that are employed at NACCOP member institutions. NACCOP will continue to replicate this study in future years to track any trends or patterns that emerge as well as to survey the membership about the effect external events may have on the profession. We welcome any suggestions you may have for questions or topical areas that should be included in future surveys regarding CCOs. To submit your ideas, please email info@naccop.org.



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²Melinda Warthman, J.D., serves as Chair of NACCOP's Research Committee and is the Clery Compliance and Records Administrator at the University of Dayton in Dayton, OH.

³https://nces.ed.gov/collegenavigator/

⁴http://carnegieclassifications.iu.edu/lookup/lookup.php

⁵ Descriptive statistics were tabulated for all survey questions. In determining whether any of the variables collected in the survey could explain any differences in the CCO's reported annual base salary, independent t-tests were run when the predictor variable was categorical and there were only 2 levels of the predictor (when more than 2 levels were present, analyses of variance were run). Where significant differences were found at the .05 significance level, post hoc analyses were computed to determine where the statistically significant differences lie. When a continuous predictor variable was at issue, Pearson correlation analyses were conducted to determine whether there is a relationship between the variables and, if so, Cohen's D was used to determine the size of the difference. Not all variables were subjected to statistical analyses, as too few observations in one or more levels prevented running any meaningful tests. Results of analyses conducted are presented in this whitepaper. Not all percentages reported appear to add up to 100% due to rounding.

^oThe number of hours of training, as reported here, was calculated from the pre-defined training options from which respondents could select. Any additional trainings reported via an "Other" response are not incorporated into the results in this section.

⁷Pettit, Emma. AAUP Survey Spells Bad News for Faculty Wages Amid Pandemic, Chronicle of Higher Education (April 12, 2001). https://www.chronicle.com/blogs/live-coronavirus-updates/aaup-survey-spells-badnews-for-faculty-wages-amid-pandemic



CLERY COMPLIANCE OFFICER CERTIFICATION PROGRAM

About the Program

The Clery Compliance Officer (CCO) Certification Program will provide candidates with the opportunity to immerse themselves in a comprehensive professional development program that leads to a professional credential from the only association serving the needs of Clery compliance officers and professionals.

Individual Benefits

- Achieve a professional-level credential
- Develop expertise in Clery Act compliance
- Become a leader in the field
- Learn how to develop an effective system to keep the institution in compliance
- Interact and network with other CCO Certification Program Candidates
- Prepare for growth and future advancement
- Participate in a rigorous combination of educational initiatives designed to prepare you to effectively lead your institution's Clery Act compliance program

Institutional Benefits

- Ensure that your staff has mastered essential concepts to effectively lead the institution's Clery Act compliance program
- Make a strategic investment in the professional development of your staff
- Mitigate the risk of noncompliance and its consequences (i.e. fines, negative media publicity, etc.)
- Provide your staff with a network of other credentialed practitioners
- Enhance administrative capacity to manage Clery Act compliance, as expected by the Department of Education

CCO Certification Program Pricing

NACCOP Members

\$2,800

(\$275 annual recertification fee* after successful completion)

NACCOP Non-members

\$3,800

(\$375 annual recertification fee* after successful completion)

The Certification Fee can be paid in one, two or three installments (see NACCOP website for details).

*Candidates who successfully earn the NACCOP CCO Certification will be required to complete several online classes each year to maintain the certification.



