



ASSOCIATION OF CERTIFIED
SANCTIONS SPECIALISTS

WWW.SANCTIONSASSOCIATION.ORG

CSS CANDIDATE HANDBOOK



ABOUT THE CANDIDATE HANDBOOK



This handbook provides the details of the procedure for obtaining a CSS qualification.

- Refer to the application process, which provides eligibility requirements and the steps to follow for purchasing your preferred certification package.
- Once registered, follow the steps for taking the course and preparing for the exam. Refer to other sections for details of our exam options, policies and rules.
- Read through the summarized content that forms the basis of the examination.

The CSS Handbook concludes with details about maintaining certification

Course Material

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

CSS Exam Preparation Guide

The CSS Exam Preparation Guide is your primary reference material and content source for preparing for the rigors of the CSS examination. The CSS Exam Preparation Guide is provided in an online PDF format. It can be downloaded from the ACSS learning management system.

The guide ends with practice questions to test your knowledge in preparation for the exam. You can refer to Presentation Slides in the Learning Management System (LMS) under Additional References to help you with your studies. Your comprehension of the material determines your success.

CSS Virtual Classroom (Optional)

Candidates needing extra guidance and study structure may enroll in the CSS Virtual Classroom. This provides candidates with a structured learning environment. The study materials are divided into six two-hour classes that meet once a week with an expert instructor through 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 in the CSS Exam Preparation 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 course material.

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 on all CSS examination candidates, including criminal records. 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, if an individual is subject to a background check and does not pass, that individual will not be allowed to take the CSS examination.



WHAT YOU WILL LEARN

What You Must Know to Pass the Exam

The CSS curriculum provides you with the knowledge sanctions officers need to comply with sanctions rules and regulations. In creating the program, we analyzed job requirements, US, EU and UK regimes and international best practices, and international sanctions frameworks.

We provide the certification on three different packages.

OPTION 1 CSS Certification Standard Package

Package includes:

- 1. The CSS Exam (physical or virtual)**
- 2. The CSS Exam Preparation Guide**

This is your primary reference material and content source for preparing for the CSS examination. The CSS Exam Preparation Guide is provided in an online PDF format. It can be downloaded from the ACSS course page.

OPTION 2 Certification Self-Paced Package

Package includes:

- 1. Everything in the CSS Certification Standard Package**
- 2. 40+ Videos**

Our specially prepared videos cover all the topics you need to know, starting with an introduction to the CSS Exam. The program continues with an additional videos featuring lively, instructive, concise videos covering the breadth of sanctions in six sections. When you have finished, you will know all about the types of sanctions, the imposers, the targets, have a foundation for a successful sanctions program, be able to discuss the 50% Rule, know how to contend with evaders, be familiar with screening, sanctions investigations, and much more.

OPTION 3

CSS Certification plus Virtual Classroom Package

Package includes:

1. Everything in the CSS Certification Self-Paced Package

2. Six 2-hour virtual classroom training sessions

Receive extra guidance in a structured learning environment. An expert instructor discusses the study materials and assists in six live weekly, two-hour, web-based interactive classes.

Syllabus for CSS Certification Plus Virtual Classroom Package

Virtual Class 1 Sanctions Regime Types, Prohibitions and Effects

- Sanctions definitions and categories
- Common prohibitions and exceptions
- Effects and unintended consequences

Virtual Class 2 Sanctions Imposers and Targets: The International Arena

- | | | |
|---|--|--|
| <ul style="list-style-type: none">• UN Sanctions<ul style="list-style-type: none">- Overview and legal foundation- UN Sanctions Listing, process, delisting- How to read a UNSC resolution | <ul style="list-style-type: none">• EU Sanctions<ul style="list-style-type: none">- Overview and legal foundation- Listing, process, delisting- Enforcement | <ul style="list-style-type: none">• UK Sanctions<ul style="list-style-type: none">- Overview and legal authorities- Agencies- Licensing and enforcement |
|---|--|--|

Virtual Class 3 Sanctions Imposers and Targets: Spotlight United States

- | | |
|---|--|
| <ul style="list-style-type: none">• United States legal basis• Statutes, EOs and Regs• OFAC Organization• Who Must Comply? | <ul style="list-style-type: none">• Key Programs and targets• Types of Sanctions, exemptions and Licenses |
|---|--|

Virtual Class 4 Essential Components of Sanctions Compliance Programs

- Five Elements of an OFAC Sanctions Compliance Program
- Customer Due Diligence and OFAC 50% Rule
- Compliance Considerations for Specific Industries

Virtual Class 5 Role of Technology, List Screening and Other Operational Processes

- Technology and Screening Principles and Definitions and Wolfsberg Guidance
- Sanctions Screening Tools: Common Functions
- Sanctions Screening Process and Sanctions Lists
- Other operational issues: freezing, reporting, contractual clauses and licenses

Virtual Class 6 Enforcement, Investigations and Sanctions Evasion

- OFAC investigations and enforcement
- Interaction with other agencies
- Internal investigations and VSD
- Sanctions evasion in the financial sector and other sectors

TAKING THE CSS EXAM



Step 1 **Download** the eligibility form.

Step 2 Obtain supporting documentation to show 40+ credits and three references.

Step 3 Click to upload eligibility form and supporting documentation

Select your Exam Type

If you choose a Testing Center:

1. ACSS will send your information to our testing partner, Pearson Vue.
2. Pearson Vue will send you an email with a link to self-register for the exam.
3. Schedule your exam.

If you choose the Self-proctored Option:

1. ACSS will send your information to our testing partner, Strasz.
2. Strasz will send you an email with a link to self-register for the exam.
3. Once registered, you will be sent two emails: one will address how to check your equipment before the exam; the other will be a link to the exam.

Step 4 When all your information has been uploaded, ACSS staff will verify your documentation. You will be sent an email requesting additional information or approving your application.

Step 5 After your application has been approved, you will choose whether to take your exam at a center or self-proctored at your home or office.

POINT REQUIREMENTS TO TAKE THE EXAM

Candidates wishing to take the CSS exam must have a **minimum of 40 qualifying credits** based on education, other professional certification, and professional experience in the sanctions field. The following list represents the CSS credit award system for exam eligibility:

I. Education *

- Associate Degree **10 points**
- Bachelor's Degree **20 points**
- Masters Degree/PhD/JD or Equivalent **30 points**

II. Professional Experience

Each year of full-time experience in Sanctions or export controls in industry, legal, technology, service provider, consulting or financial institution or government. Professional experience is limited to 3 years. **10 points per year, maximum 30 points**

III. Other Certificates

Professional Certification (Financial Related) — (CAMS, CPA, CPP, CRCM, CFE, CPE, CIA, CA/AML, FINRA Series, etc.) ** **30 points per certification**

Any certification program must include a minimum of eight (8) hours of instruction and a certification exam. provide copies of certificate(s) and proof of valid membership in good standing

IV. Sanctions Training

Attendance at a course/seminar/web seminar/conference or training session on the topic of sanctions or export controls or financial crime (includes internal and external training) *** **Unlimited points**

provide copy of certificate(s) of attendance or receipt of payment from entity conducting training).

V. CSS Virtual Class Training **21 points**

- 6 easy-to-follow 2-hour virtual classes over a six week period

* Only one degree may be used toward the 40 qualifying credits for the CSS examination.

** Please note, these credits are in recognition of the AML/Financial Fraud portion of the FINRA certification training. As such, you will only earn a maximum of 10 credits regardless of the number of FINRA licenses you possess.

*** Supporting documentation (if necessary accompanied by a translation in English) must accompany information submitted to meet minimum credit criteria in order to sit for the CSS Examination (i.e., copies of degree, certificates of completion). Please submit all required documentation with your completed application and fee.

CSS EXAMINATION BLUEPRINT

The CSS curriculum provides you with the knowledge to fulfill the pressing work demands of sanctions. In creating the course and exam, we analyzed job requirements, US and international best practices, international sanctions frameworks. We grouped the corresponding material into seven core domains. Figures with percentages show the extent they comprise the course material. Your knowledge will be examined in approximately 110 multiple-choice questions. You will have three hours to complete the exam.

I. Sanctions Regime Types, Goals, Prohibitions and Effects (10–12%)

- State why sanctions exist and give a brief history
- Define the types of economic/financial/trade sanctions regimes for implementation in a sanctions compliance program.
- Identify and describe sanctions regimes' common prohibitions (facilitations) and exemptions.
- Understand how to measure the effectiveness 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 resolution 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 and UK sanctions regimes.
- Name the main US agencies involved in sanctions, their roles in their enforcement, and their extraterritorial reach.
- Identify and assess key other unilateral sanctions imposers (Australia, Japan, Canada) 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 Industries (28–30%)

- A. Get management's commitment to supporting an organization's risk-based sanctions compliance program.
- B. Design and implement a sanctions risk assessment. Identify customer/product/geography-related sanctions risks. Conduct and maintain a sanctions risk assessment for clients and customers, products and services, supply chain, intermediaries, counter-parties, transactions and geographic locations.
- C. Develop policies and procedures for internal controls based on industry-leading practices. Analyze new government policies and regulatory and enforcement developments.
- D. Designate a sanctions officer and hire staff. Oversee the hiring of qualified personnel.
- E. Conduct training and communicate with stakeholders to develop awareness and advise them. Supervise line-level personnel to ensure procedures are applied using operational instructions and guidelines.

V. Role of Technology and List Screening (20–22%)

- Articulate general principles, concepts and fundamental pillars behind sanctions screening and the applications.
- Develop, implement, and maintain a watchlist of screening tools.
- Evaluate and hire list screening vendors.

VI. Other Operational Issues Contributing to an Effective Sanctions Compliance Program (14–16%)

- Assist with the resolution of standard and complex cases.
- Obtain, manage or review licenses authorizing transactions that sanctions may otherwise prohibit.
- Reference how to use contractual clauses and warranties. Draft contractual clauses with extra protection in higher-risk situations. Address contractual obligations when sanctions impact a party's ability to perform.
- To streamline operations, know the options and risks of outsourcing certain sanctions compliance tasks to freight forwarders and other business partners or third-party agents.
- Reference how the sanctions program overlaps related compliance programs such as trade controls, anti-money laundering, anti-bribery, and corruption.
- Critically evaluate the forces in a business environment that cause sanctions compliance dilemmas.

VII. Enforcement and Conducting or Supporting Investigations into Sanctions Violations (6–8%)

- Articulate law enforcement agencies' role in investigating sanctions violations. Know how they coordinate to investigate potential sanctions violations or support the investigation process.
- Engage with government agencies.
- Understand the various government stakeholders in the applicable sanctions regimes.
- Investigate potential/historical internal violations of sanctions-related laws or policies utilizing modern techniques. Include document reviews, data analysis, interviews, and external resources.

THINGS TO KNOW ABOUT CSS TESTING OPTIONS

You can take the CSS exam at a testing center or remotely proctored in your house or office.

Physical Testing Facility Center Option

If you choose to take the exam at a physical testing center, you will receive an email from our testing partner, Pearson Vue. You will be asked to register on their testing site to select a location and an available date/time slot.

The email will include your credentials so that you can select a location and a time slot. The link to register for the exam is <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 of 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 a 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 found in possession of electronic equipment.

For more information, see <https://home.pearsonvue.com/acss>. For Pearson Vue's data and privacy policies, see <https://home.pearsonvue.com/privacy>.

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 counts 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.

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 Requirements

If you have elected to take the remote-proctoring option, you must provide either a mobile device or laptop with adequate specification.

Mobile Device

You need a mobile phone to download the ProctorExam app. Instructions for downloading the app will be provided during the system check process. You can do this before your system check by accessing the Google Play Store for Android devices or the App Store for iOS (Apple) devices and searching for ProctorExam. The specifications required are:

- Android 4.1 or higher.
- iOS (Apple) 8.0 or higher. You can see your operating system version in the settings of your phone.
- A minimum video resolution of 800 x 600 px.

Ensure you can connect to WiFi if data usage is an issue.

Plug in your mobile device for the duration of your exam.

Notebook or Personal Computer

Check your specification to ensure it meets the requirements for ProctorExam:

- Operating systems: Windows 7 or higher; MAC OS X; Linux 64-bit Ubuntu 14.04+, Debian 8+, openSUSE 13.3+, or Fedora Linux 24+.
- WiFi connection – position yourself where the signal is strongest.
- Web browser – the latest version of Google Chrome.
- Webcam – a maximum resolution of 1280 x 720 px.
- Working microphone.
- Working audio.

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

Internet Connectivity

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

Registration

Once registered to take the remote-proctored 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. The email will come from Strasz, our testing partner.

System Check

Your email on how to perform a system check will provide instructions on how to set up your PC correctly so that you will be ready for the exam. Before you perform your system check, we strongly advise you to do the following:

1. Ensure you are using the latest version of Google Chrome. To check if you have the latest version:
 - a) On your computer, open Chrome.
 - b) Click on the icon in the upper corner that looks like three dots.
 - c) Click on Help.
 - d) Click on About Google Chrome, which will show your latest version and whether it is up to date.
 - e) Click on the icon in the upper corner that looks like three dots.
 - f) Click Update Google Chrome. You're on the latest version if you don't see this button.
 - g) Click Relaunch.
2. Allow pop-ups for ProctorExam:
 - a) Type `chrome://settings/content` into the address bar and press Enter.
 - b) Select Pop-ups from the Content Settings screen.
 - c) In Allow, click Add and enter `https://surpass.proctorexam.com`.
 - d) Close the Content Settings screen and refresh your browser to enable Flash.
3. Install the ProctorExam extension/plugin within Chrome to allow screen sharing:
 - a) Go to the link below to download the Chrome extension.
 - b) <https://chrome.google.com/webstore/detail/proctorexam-screen-sharin/digojkgonhgmnohbapdfjllpnmjmdhpg>.
 - c) Or go to <https://chrome.google.com/webstore/category/extensions> and search for ProctorExam Screen Sharing and click on the link.
 - d) Click on Add to Chrome.
 - e) 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

Another email will be sent before your exam date. If you cannot see it – again, please check your junk email folder. This email contains the link to your exam.

1. You will need to use your mobile phone for the exam 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.
2. When you are due to take your exam, 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.
3. When you are in the instance of Surpass, you must enable Flash in the Chrome browser. You will require Adobe Flash Player 18 to 28.0.0.161.
4. You will be presented with the following on screen: “This page requires Flash, select Here to enable Flash content.”
5. Click on Here.
6. Click on Allow, which will appear in the top left of the screen.
7. 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 exam day, you can access online chat support if you encounter any technical difficulties. 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 close the ProctorExam environment fully, please click on the Finish Exam button in the top right of the screen, as shown below. This will ensure it 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.

To remove the extension after completing your exam, right-click on the icon and then click Remove from Chrome. The extension will now be removed.

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



Available in the
Chrome Web Store

EXAM RESULTS, APPEALS, CANCELLATIONS, RETAKES

Results and Confidentiality

You will receive your exam results immediately (pass or fail) after the test. Results will not be given over the telephone, by facsimile, or by email.

When an organization pays for an individual's examination, it may request the result from ACSS. If a candidate does not want this information released to the organization, the candidate must notify ACSS by writing to: membership@sanctionsassociation.org

Rescheduling and Cancellation Policy

Registration for the CSS course includes two testing opportunities. If you wish to reschedule or cancel your exam without an additional fee, contact Pearson VUE at least 72 hours before your appointment. Exams cannot be rescheduled less than 72 hours beforehand. Failing to cancel within this period and not attending counts as one testing opportunity.

What is the procedure for the remote test?

Appeals

ACSS provides an appeal mechanism for challenging the denial of admission to the exam or revocation of the certification. It is the individual's responsibility to initiate the appeal process by written request to ACSS within 30 days of the circumstance leading to the appeal. Failing to attend or failing the exam does not constitute grounds for a review and appeal.

The examination performance of all candidates is monitored and may be analyzed statistically for the 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.

Retaking the Exam

Candidates who do not pass can retake the examination. One retake is included in each certification package.

Candidates have one year to take their first exam from the date of purchasing the certification package.

If the exam is not taken within the year of enrollment, an application must be made for re-examination. A complete application, documentation of eligibility and examination fee must be resubmitted.

The examination cannot be taken more than three consecutive times; no exceptions are allowed. The waiting period to retake the test after the third consecutive attempt is six months.

To schedule a retake, the candidate must:

1. Contact ACSS at helpdesk@sanctionsassociation.org
2. Pay the examination fee
3. Reschedule the exam.

CSS RECERTIFICATION



Further Education and Recertification

The ACSS has a wealth of resources dedicated to increasing sanctions knowledge to help members continue their professional development to keep skills sharp and current to maintain their certification. **Seminars, conferences, and chapter** meetings are scheduled regularly and announced on the ACSS website – www.sanctionsassociation.org.

Credits are given to confirm that our members have continued with their sanctions education. Members must acquire 60 credits every three years, when their recertification fee is due, to maintain their CSS credential. See *CSS Recertification* for further details.

Policies

Recertification Requirements

To recertify the CSS credential, you must meet the following requirements:

1. Meet the continuing education credit requirements.
2. Submit an online application with the appropriate renewal fees.

Continuing Education Credit Requirements

- Sixty continuing education credits must be accumulated within a three-year cycle. These can be sanctions or trade controls-related courses from ACSS, internal training, or other providers.
- Applicants will not be granted continuing education credits for activities completed before obtaining their CSS credential or their most recent recertification.
- Additional credits earned in excess of 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 recertification.

Deadline for CSS Recertification

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

Late applications will be accepted only up to 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 if ACSS should find it necessary to audit their records.

Recertification Audit

The ACSS audit process ensures that ACSS-certified individuals comply with recertification requirements. Audits are performed regularly. ACSS will notify selected audit candidates, advising them of the procedures.



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WWW.SANCTIONSASSOCIATION.ORG

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